

**Iowa Department of Natural Resources
Title V Operating Permit**

Name of Permitted Facility: Lafarge North America Inc.

**Facility Location: 301 East Front Street
Buffalo, IA 52728**

Air Quality Operating Permit Number: 04-TV-007-M001

Expiration Date: March 28, 2009

EIQ Number: 92-3093

Facility File Number: 82-04-005

Responsible Official

Name: Alain Pfaff

Title: Plant Manager

**Mailing Address: P.O. Box 690
Buffalo, IA 52728**

Phone #: (563) 328-6201

Permit Contact Person for the Facility

Name: Scott Nielson

Title: Environmental Manager

**Mailing Address: P.O. Box 690
Buffalo, IA 52728**

Phone #: (563) 328-6206

This permit is issued in accordance with 567 Iowa Administrative Code Chapter 22, and is issued subject to the terms and conditions contained in this permit.

For the Director of the Department of Natural Resources

Douglas A. Campbell, Supervisor of Air Operating Permits Section

Date

Table of Contents

I. Facility Description and Equipment List.....	4
II. Plant - Wide Conditions	10
III. Emission Point Specific Conditions.....	14
IV. General Conditions	65
G1. Duty to Comply	
G2. Permit Expiration	
G3. Certification Requirement for Title V Related Documents	
G4. Annual Compliance Certification	
G5. Semi-Annual Monitoring Report	
G6. Annual Fee	
G7. Inspection of Premises, Records, Equipment, Methods and Discharges	
G8. Duty to Provide Information	
G9. General Maintenance and Repair Duties	
G10. Recordkeeping Requirements for Compliance Monitoring	
G11. Evidence used in establishing that a violation has or is occurring.	
G12. Prevention of Accidental Release: Risk Management Plan Notification and Compliance Certification	
G13. Hazardous Release	
G14. Excess Emissions and Excess Emissions Reporting Requirements	
G15. Permit Deviation Reporting Requirements	
G16. Notification Requirements for Sources That Become Subject to NSPS and NESHAP Regulations	
G17. Requirements for Making Changes to Emission Sources That Do Not Require Title V Permit Modification	
G18. Duty to Modify a Title V Permit	
G19. Duty to Obtain Construction Permits	
G20. Asbestos	
G21. Open Burning	
G22. Acid Rain (Title IV) Emissions Allowances	
G23. Stratospheric Ozone and Climate Protection (Title VI) Requirements	
G24. Permit Reopenings	
G25. Permit Shield	
G26. Severability	
G27. Property Rights	
G28. Transferability	
G29. Disclaimer	
G30. Notification and Reporting Requirements for Stack Tests or Monitor Certification	
G31. Prevention of Air Pollution Emergency Episodes	
G32. Contacts List	
V. Appendix A...Administrative Consent Order No. 98-AQ-08.....	78

VI.	Appendix B...Operation & Maintenance Plans.....	105
VII.	Appendix C...Applicable Limits and Requirements From 40 CFR 63 § LLL.....	135
VIII.	Appendix D...IDNR Air Quality Policy 3b08 (Opacity).....	149

Abbreviations

acfm.....	actual cubic feet per minute
CFR	Code of Federal Regulation
dscf.....	dry standard cubic feet
dscm.....	dry standard cubic meters
°F	degrees Fahrenheit
EIQ	emissions inventory questionnaire
gr./dscf.....	grains per dry standard cubic foot
gr./100 cf	grains per one hundred cubic feet
hp./hr.....	horsepower hours
IAC	Iowa Administrative Code
IDNR	Iowa Department of Natural Resources
KWH.....	kilowatts per hour
MVAC	motor vehicle air conditioner
N/A.....	not applicable
ng./dscm.....	nanogram per dry standard cubic meter
NSPS	new source performance standard
ppmv.....	parts per million by volume
lb./hr	pounds per hour
lb./MMBtu.....	pounds per million British thermal units
MMcf./hr.....	million cubic feet per hour
scfm	standard cubic feet per minute
TEQ.....	toxicity equivalents
TPY	tons per year
TPH.....	tons per hour
USEPA	United States Environmental Protection Agency
VMT/hr.....	vehicle miles traveled per hour

Pollutants

PM	particulate matter
PM ₁₀	particulate matter ten microns or less in diameter
SO ₂	sulfur dioxide
NO _x	nitrogen oxides
VOC	volatile organic compound
CO	carbon monoxide
HAP	hazardous air pollutant
D/F.....	dioxins and furans

I. Facility Description and Equipment List

Facility Name: Lafarge North America, Inc.

Permit Number: 04-TV-007-M001

Facility Description: Portland Cement Plant

Equipment List

A. Fugitives Subject to Fugitive Dust Rule Only

Emission Point Number	Associated Emission Unit Number	Associated Emission Unit Description
0040-0-F	0040-3-F	Raw Materials Screening
0070-0-F	0070-1-F	Raw Materials Loading in Quarry
0081-0-F	0081-1-F	Quarry Drilling
0110-0-F	0110-1-F	Raw Materials Storage Pile
	0110-2-F	Storage Pile Load In/Out
0120-0-F	0120-1-F	Raw Materials Storage Pile
	0120-2-F	Storage Pile Load In/Out
0130-0-F	0130-1-F	Raw Materials Storage Pile
	0130-2-F	Storage Pile Load In/Out
0200-0-F	0200-1-F	Front End Loader Filling Clay Hopper
	0200-2-F	Front End Loader Filling Stone Hopper
	0200-3-F	Raw Material Transfer to Apron Feeder
	0200-4-F	Dump Hopper to Apron Feeder
	0200-5-F	Apron Feeder Transfer to Primary Crusher
	0200-6-F	0225 Crusher Transfer to 0221
	0200-7-F	0221 Belt Transfer to 0208
	0200-8-F	0225 Primary Crusher Fugitives
0203-0-F	0203-1-F	Raw Material Transfer-Conveyor to Conveyor

A. Fugitives Subject to Fugitive Dust Rule Only (cont.)

Emission Point Number	Associated Emission Unit Number	Associated Emission Unit Description
0300-0-F	0300-1-F	Raw Material Transfer-Conveyor to Conveyor
	0300-2-F	Raw Material Transfer-Conveyor to Conveyor
	0300-3-F	Raw Material Transfer-Conveyor to Pile
	0300-4-F	Raw Material Transfer-Pile to Conveyor
0387-0-F	0387-1-F	Raw Material Transfer-Conveyor Over Road
0684-0-F	0684-1-F	Conveyor Transfer to Coal Silo

B. Fugitives Subject to 40 CFR 63 Subpart LLL

Emission Point Number	Associated Emission Unit Number	Associated Emission Unit Description
0400-0-F	0400-1-F	Raw Material Transfer – Weigh Feeder to Conveyor
0487-0-F	0487-1-F	0487 Slide Gate Truck Loading
0488-0-F	0488-1-F	0488 Manual Flop Gate Truck Loading
0576-0-F	0576-1-F	0576 Manual Flop Gate-Truck Loading
0718-0-F	0718-1-F	Clinker Bin Load Out-Truck Loading
0766-0-F	0766-1-F	0766 Feeder Transfer to 0722 Belt Conveyor
0800-0-F	0800-1-F	Finish Mill Building Fugitives – Interior DC
	0889-1-F	Belt Conveyor to Belt Conveyor Transfer – Interior DC
0906-0-F	0906-1-F	Belt Conveyor to Belt Conveyor Transfer – Interior DC
0926-0-F	0926-1-F	Belt Conveyor to Belt Conveyor Transfer – Interior DC
1300-0-F	1300-1-F	Rail Loading Fugitives
	1300-2-F	Truck Loading Fugitives
2601-0-F	2601-1-F	Barge Loading System (Fugitives)

C. Haulroads Subject to Administrative Consent Order No. 98-AQ-08

Emission Point Number	Associated Emission Unit Number	Associated Emission Unit Description
0155-0-F	0155-1-F	Quarry Haulroad-Rock Hauling
0160-0-F	0160-1-F	Quarry Haulroad-Clay Hauling
0165-0-F	0165-1-F	Haulroad-Clay from Storage Piles to Crusher
0691-0-F	0691-1-F	Haulroad-Rail Unloading Raw Materials
0692-0-F	0692-1-F	Haulroad-Rail Unloading Clinker
0695-0-F	0695-1-F	Haulroad-Rail Unloading Fuel
0765-0-F	0765-1-F	Unpaved Haulroad to 0765 Feeder
	0765-2-F	Paved Haulroad to 0765 Feeder
1301-0-F	1301-1-F	Haulroad-Truck Loadout of Cement

D. Conveying System Transfer Points\ Raw and Finish Mills\ Storage Bins\ Bulk Loading and Unloading Units Subject to 40 CFR 63 Subpart LLL

Emission Point Number	Associated Emission Unit Number	Associated Emission Unit Description
0404-0	0404-1	Raw Material Transfer- Conveyor to Homogenization Silos
0420-0	0420-1	Raw Material Transfer- Airslides to Vertical Conveyor
0498-0	0498-1	Raw Material Transfer- Conveyors to Preblend Bin
0504-0	0504-1	Raw Material Transfer- Airslides/Separator/Bin to Kiln
0709-0	0709-1	Drag Conveying Clinker
0743-0	0743-1	Drag Conveying Clinker
0811-0	0811-1	Finish Mill Holding Bin
0817-0	0817-1	Finish Mill (Particulate Emissions)
	0817-2	Finish Mill (VOC Emissions)
0822-0	0822-1	Finish Mill Air Separator
0950-0	0950-1	Barge Loading Silo

D. Conveying System Transfer Points\ Raw and Finish Mills\ Storage Bins\ Bulk Loading and Unloading Units Subject to 40 CFR 63 Subpart LLL (cont.)

Emission Point Number	Associated Emission Unit Number	Associated Emission Unit Description
1007-0	1007-1	A.E. Silos # 15-30
1017-0	1017-1	Conebottom Silos # 31-40
1041-0	1041-1	Rail Car Loading System- Silo # 41
1044-0	1044-0	North Truck Loading Spout
	1440-03	Airslide Conveyor
	1442-05	Airslide Conveyor
1045-0	1045-1	South Bulk Truck Loadout System
1047-0	1047-1	Rail Car Loading System- Silos # 47 & 48
1053-0	1053-1	West Overtrack Silos
2601-0	2601-1	Barge Loading Spout System

E. Miscellaneous Sources

Emission Point Number	Associated Emission Unit Number	Associated Emission Unit Description
0020-0	0020-1	Emergency Generator
0030-0	0030-1	Diesel Water Pump
0081-0	0081-1	Quarry Drill
0203-0	0203-1	Raw Material Transfer-Conveyor to Conveyor
0218-0	0218-1	Primary Crusher and Conveyor Belt Transfer
0327-0-F	0327-1-F	Raw Material Transfer- Vibrating Feeder to Conveyor
0466-0	0466-1	Preheater/Precalciner/Kiln/Raw Mill System
	0466-2	Alkali Bypass
0499-0	0499-1-F	20,000 gallon Fuel Oil Tank
0535-0	0535-1	CKD Handling Silo
0611-0	0611-1	Clinker Cooler and Drag Conveyor

E. Miscellaneous Sources (cont.)

Emission Point Number	Associated Emission Unit Number	Associated Emission Unit Description
0667-0	0667-1	Coal Mill and Bins
	0667-1	Coal Mill and Bins
0684-0	0684-1	Coal Silo
0690-0-F	0690-3-F	Coal Hopper/Weigh Feeder-Load In/Out
0723-0-F	0723-1-F	Clinker Reclaim Vibrating Feeders

Insignificant Equipment List

Insignificant Emission Unit Number	Insignificant Emission Unit Description
I-1	2,000 Gallon Waste Motor Oil Storage Tank
I-2	5,524 Gallon #2 Fuel Oil Storage Tank
I-3	10,000 Gallon Grinding Aid Storage Tank (maximum vapor pressure 0.00003psia)
I-4	10,000 Gallon Grinding Aid Storage Tank (maximum vapor pressure 0.00003psia)
I-5	Maintenance Welding
I-6	Maintenance Chute-Preheater Tower
I-7	Maintenance Chute-Clinker Cooler
I-8	Maintenance Chute-Coal Mill
I-9	Maintenance Chute-Raw Mill
I-10	Hot Water Heater (0.095 MMBtu/hr)
I-11	Hot Water Heater (30 psi boiler 1.2 MMBtu/hr)
I-12	Parts Washer-44 Gallon Cap.
I-13	Parts Washer-44 Gallon Cap.
0040-1-F	Raw Materials Storage Pile
0040-2-F	Raw Materials Storage Pile Load In/Out
0040-4-F	Load Out of Screened Material
0060-1-F	Overburden Removal
0082-1-F	Quarry Blasting
0204-1-F	Road Stone/Mason Stone Stockpile
0204-2-F	Road Stone/Mason Stone Stockpile-Load In/Out
0207-1-F	Raw Material Transfer-Flop Gate
0538-1-F	CKD Load Out
0538-2-F	Haulroad-CKD to Landfill
0538-3-F	CKD Landfill Load Out
0576-1-F	0576 Manual Slide Gate Load Out
0655-1-F	Barge Load In/Out (Coal)
0655-2-F	Haulroad - Barge to Coal Stockpile

Insignificant Equipment List (cont.)

Insignificant Emission Unit Number	Insignificant Emission Unit Description
0677-1-F	0677 Manual Flop Gate-Truck Loading
0690-1-F	Coal Transfer-Conveyor to Conveyor
0690-2-F	Coal/Raw Material/Clinker Piles Wind Erosion
0690-4-F	Coal Stockpile Load In/Out
0696-1-F	Raw Materials Stockpile – Wind Erosion
0696-2-F	Raw Material Stockpile-Load In/Out
0697-1-F	Rail Unloading-Fuel, Raw Materials
0697-2-F	Rail Unloading-Clinker
0760-1-F	Stockpiles (North of Silo)-Wind Erosion
0760-2-F	Clinker Stockpile-Load In/Out
0760-3-F	Raw Material Stockpile-Load In/Out
0761-1-F	Unloading Gypsum Into Gypsum Hopper
0761-2-F	Unloading Clinker Into Gypsum Hopper
0770-1-F	Storage Hall Stockpile-Wind Erosion
0770-2-F	Stockpile-Load In/Out Clinker
0770-3-F	Stockpile-Load In/Out Raw Materials

II. Plant-Wide Conditions

Facility Name: Lafarge North America Inc.
Permit Number: 04-TV-007-M001

Permit conditions are established in accord with 567 Iowa Administrative Code rule 22.108

Permit Duration

The term of this permit is: Five (5) years
Commencing on: March 29, 2004
Ending on: March 28, 2009

Amendments, modifications and reopenings of the permit shall be obtained in accordance with 567 Iowa Administrative Code rules 22.110 - 22.114. Permits may be suspended, terminated, or revoked as specified in 567 Iowa Administrative Code Rules 22.115.

Emission Limits

Unless specified otherwise in the Source Specific Conditions, the following limitations and supporting regulations apply to all emission points at this plant:

Opacity (visible emissions): 40% opacity
Authority for Requirement: 567 IAC 23.3(2)"d"

Sulfur Dioxide (SO₂): 500 parts per million by volume
Authority for Requirement: 567 IAC 23.3(3)"e"

Particulate Matter (state enforceable only)¹:

No person shall cause or allow the emission of particulate matter from any source in excess of the emission standards specified in this chapter, except as provided in 567 – Chapter 24. For sources constructed, modified or reconstructed after July 21, 1999, the emission of particulate matter from any process shall not exceed an emission standard of 0.1 grain per dry standard cubic foot of exhaust gas, except as provided in 567 – 21.2(455B), 23.1(455B), 23.4(455B) and 567 – Chapter 24.

For sources constructed, modified or reconstructed prior to July 21, 1999, the emission of particulate matter from any process shall not exceed the amount determined from Table I, or amount specified in a permit if based on an emission standard of 0.1 grain per standard cubic foot of exhaust gas or established from standards provided in 23.1(455B) and 23.4(455B).

Authority for Requirement: 567 IAC 23.3(2)"a" (as revised 7/21/1999)

¹ This is the current language in the Iowa Administrative Code (IAC). This version of the rule is awaiting EPA approval to become part of Iowa's State Implementation Plan (SIP). When EPA approves this rule, it will replace the older version and will be considered federally enforceable.

Particulate Matter (federally enforceable)²:

The emission of particulate matter from any process shall not exceed the amount determined from Table I, except as provided in 567 — 21.2(455B), 23.1(455B), 23.4(455B) and 567 — Chapter 24. If the director determines that a process complying with the emission rates specified in Table I is causing or will cause air pollution in a specific area of the state, an emission standard of 0.1 grain per standard cubic foot of exhaust gas may be imposed.

Authority for Requirement: 567 IAC 23.3(2)"a" (prior to 7/21/1999)

Fugitive Dust: Attainment and Unclassified Areas - No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered repaired or demolished, with the exception of farming operations or dust generated by ordinary travel on unpaved public roads, without taking reasonable precautions to prevent particulate matter in quantities sufficient to create a nuisance, as defined in Iowa Code section 657.1, from becoming airborne. All persons, with the above exceptions, shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate. The highway authority shall be responsible for taking corrective action in those cases where said authority has received complaints of or has actual knowledge of dust conditions which require abatement pursuant to this subrule.

Reasonable precautions may include, but not limited to, the following procedures.

1. Use, where practical, of water or chemicals for control of dusts in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land.
2. Application of suitable materials, such as but not limited to asphalt, oil, water or chemicals on unpaved roads, material stockpiles, race tracks and other surfaces which can give rise to airborne dusts.
3. Installation and use of containment or control equipment, to enclose or otherwise limit the emissions resulting from the handling and transfer of dusty materials, such as but not limited to grain, fertilizers or limestone.
4. Covering at all times when in motion, open-bodied vehicles transporting materials likely to give rise to airborne dusts.
5. Prompt removal of earth or other material from paved streets or to which earth or other material has been transported by trucking or earth-moving equipment, erosion by water or other means.

Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan

The owner/operator shall comply with the applicable requirements listed below. The compliance status is based on information provided by the applicant.

Unless otherwise noted in Section III of this permit, Lafarge North America Inc. is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which become effective during the permit term, Lafarge North America Inc. shall comply with such requirements in a timely manner.

Authority for Requirement: 567 IAC 22.108(15)

² This is the current language in the Iowa SIP, and is enforceable by EPA.

Operational Limits & Requirements

The owner/operator of this facility shall comply with the operational limits and requirements listed below.

Terms and Conditions: The Permittee shall comply with all applicable requirements of *Iowa Department of Natural Resources Administrative Consent Order No. 98-AQ-08*. The Permittee shall also comply with all applicable requirements of 40 CFR 63 Subpart LLL-*National Emission Standards for Hazardous Air Pollutants for Source Categories; Portland Cement Manufacturing Industry*, and the applicable requirements of 40 CFR 63 Subpart A *General Provisions* as listed in Table 1 of 40 CFR 63 Subpart LLL. Per 40 CFR 63.1356 any affected source subject to the provisions of 40 CFR 63 Subpart LLL will be exempt from any otherwise applicable new source performance standard contained in 40 CFR 60 Subpart F or Subpart OOO, and the requirements of 40 CFR 63 Subpart Y do not apply to conveying system transfer points used to convey coal from the mill to the kiln that are associated with coal preparation.

Applicable Limits and Requirements From Iowa Department of Natural Resources Administrative Consent Order No. 98-AQ-08

Haul Road Fugitive Dust Plan

- (a) Control of dust on frequently traveled paved and unpaved roads within the facility and quarry shall be performed in accordance with Plan A, Plan C, or Plan D, as specified in Exhibit "B" of Appendix A, Iowa Department of Natural Resources Administrative Consent Order No. 98-AQ-08. For purposes of Plans A and D contained in Exhibit "B", an operating day is a 24-hour period beginning at 6 am. Lafarge may change the definition of operating day for the purposes of the consent order by submitting advance notice of the change to DNR in writing. Sweeping or watering need not occur when a rain gauge located at the site indicates that at least 0.2 inch per day of precipitation (water equivalent) has occurred. Lafarge shall conduct its fugitive dust maintenance program according to the specifications in Exhibit "B" which is recognized as providing a 95 percent control efficiency. Lafarge shall maintain a daily log of the following:

- (1) the date and time
- (2) the specific watering plan used
- (3) the volume of water or other dust suppressant applied (if applicable to the plan being utilized), and the areas of application, and
- (4) the distance traveled (if applicable to the plan utilized).

Or

- (5a) the amount and type of precipitation, if the daily precipitation is greater than 0.2 inches. (The calculations listed on page 8 of Exhibit "B", Appendix A indicate that additional watering beyond 0.2 inches of precipitation will not be needed to achieve 95 percent control).
- (5b) if the ambient temperature during the day is less than 35°F, or conditions due to weather in combination with the application of water or dust suppressant would create dangerous conditions, then the fugitive dust plan will be postponed for that operating day and the temperature recorded in a log.
- (5c) records to demonstrate that the source will not be in operation during the operating day, such that fugitive dust controls will not be required (such as

described on pages 8-9 of Exhibit "B", Appendix A).

The records shall be retained for a period of five (5) years following the date of such applications and measurements and shall be made available to the Department of Natural Resources upon request.

- (b) For purposes of the annual average emission rate for PM-10, Lafarge shall follow the "Monthly Limits" listed in Exhibit "C", Appendix A. The applicable parameters specified in Exhibit "C" shall be entered in a monthly log to demonstrate compliance with the monthly limits list. Monthly logs shall be retained for a period of five (5) years following the date of such entries and shall be made available to the Department of Natural Resources upon request.
- (c) Lafarge shall continue to comply with all paragraphs of Iowa DOT Agreement No. 94-16-69. A copy of this agreement is provided in Exhibit "E" of Appendix A.
- (d) Lafarge shall submit to the Washington DNR Field Office written quarterly reports detailing progress toward the completion of the requirements of Consent Order No. 98-AQ-08, including compliance with all air quality permits issued as a result of the Consent Order. The quarterly reports shall be due no later than 30 days following the close of each quarter.

Authority for Requirement: Iowa Department of Natural Resources Administrative Consent
Order No. 98-AQ-08

III. Emission Point-Specific Conditions

Facility Name: Lafarge North America, Inc.

Permit Number: **04-TV-007-M001**

Emission Point ID Number: See Table: Fugitives Subject to Fugitive Dust Rule Only

Associated Equipment

Associated Emission Unit ID Numbers: See Table: Fugitives Subject to Fugitive Dust Rule Only

Applicable Requirements

Table: Fugitives Subject to Fugitive Dust Rule Only

Emission Point Number	Associated Emission Unit Number	Emission Unit Description	Raw Material	Rated Capacity
0040-0-F	0040-3-F	Raw Materials Screening	Raw Materials ⁽¹⁾	76.0 TPH
0070-0-F	0070-1-F	Raw Materials Loading in Quarry	Raw Materials ⁽¹⁾	2,000 TPH
0081-0-F	0081-1-F	Quarry Drilling	Limestone	2,500 TPH
0110-0-F	0110-1-F	Raw Materials Storage Pile	Raw Materials ⁽¹⁾	0.58 acre
	0110-2-F	Storage Pile Load In/Out	Raw Materials ⁽¹⁾	210 TPH
0120-0-F	0120-1-F	Raw Materials Storage Pile	Raw Materials ⁽¹⁾	0.41 acre
	0120-2-F	Storage Pile Load In/Out	Raw Materials ⁽¹⁾	210 TPH
0130-0-F	0130-1-F	Raw Materials Storage Pile	Raw Materials ⁽¹⁾	0.58 acre
	0130-2-F	Storage Pile Load In/Out	Raw Materials ⁽¹⁾	210 TPH

Table: Fugitives Subject to Fugitive Dust Rule Only (Cont.)

Emission Point Number	Associated Emission Unit Number	Emission Unit Description	Raw Material	Rated Capacity
0200-0-F	0200-1-F	Front End Loader Filling Clay Hopper	Clay	210 TPH
	0200-2-F	Front End Loader Filling Stone Hopper	Limestone	1,400 TPH
	0200-3-F	Raw Material Transfer to Apron Feeder	Raw Materials ⁽¹⁾	210 TPH
	0200-4-F	Dump Hopper to Apron Feeder	Raw Materials ⁽¹⁾	1,400 TPH
	0200-5-F	Apron Feeder Transfer to Primary Crusher	Raw Materials ⁽¹⁾	1,400 TPH
	0200-6-F	0225 Crusher Transfer to 0221	Raw Materials ⁽¹⁾	1,400 TPH
	0200-7-F	0221 Belt Transfer to 0208	Raw Materials ⁽¹⁾	1,400 TPH
	0200-8-F	0225 Primary Crusher Fugitives	Raw Materials ⁽¹⁾	1,400 TPH
0203-0-F	0203-1-F	Raw Material Transfer-Conveyor to Conveyor	Raw Materials ⁽¹⁾	1,400 TPH
0300-0-F	0300-1-F	Raw Material Transfer-Conveyor to Conveyor	Raw Materials ⁽¹⁾	1,400 TPH
	0300-2-F	Raw Material Transfer-Conveyor to Conveyor	Raw Materials ⁽¹⁾	1,400 TPH
	0300-3-F	Raw Material Transfer-Conveyor to Pile	Raw Materials ⁽¹⁾	1,400 TPH
	0300-4-F	Raw Material Transfer-Pile to Conveyor	Raw Materials ⁽¹⁾	300 TPH
0387-0-F	0387-1-F	Raw Material Transfer-Conveyor Over Road	Raw Materials ⁽¹⁾	1,400 TPH
0684-0-F	0684-1-F	Conveyor Transfer to Coal Silo	Coal	200 TPH

⁽¹⁾ Raw materials refers to any one or a mixture of the kiln-stock materials used to produce cement, which are primarily limestone, clay, or alternative raw materials such as hydrocarbon contaminated soils. Coal and other primary fuel sources are not included in this category.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from these emission points shall not exceed the levels specified below.

Pollutant: Fugitive Dust

Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.

Authority for Requirement: 567 IAC 23.3(2)"c"

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below in Table: Fugitives Subject to Fugitive Dust Rule Only-Operational Limits & Requirements.

Table: Fugitives Subject to Fugitive Dust Rule Only-Operational Limits & Requirements

Emission Point Number	Associated Emission Unit Number	Process Throughput Limit	Reporting & Recordkeeping ⁽¹⁾	Authority for Requirements
0070-0-F	0070-1-F	365,000 tons of raw material crushed per month	The quantity of raw materials crushed shall be recorded monthly.	Section IV(2) Iowa Department of Natural Resources Administrative Consent Order No. 98-AQ-08
0081-0-F	0081-1-F	365,000 tons of raw material crushed per month	The quantity of raw materials crushed shall be recorded monthly.	
0110-0-F	0110-1-F	55,480 tons of clay crushed per month	The quantity of clay crushed shall be recorded monthly.	
	0110-2-F			
0120-0-F	0120-1-F	55,480 tons of clay crushed per month	The quantity of clay crushed shall be recorded monthly.	
	0120-2-F			
0130-0-F	0130-1-F			
	0130-2-F			
0200-0-F	0200-1-F	365,000 tons of raw materials crushed per month and transferred to the kiln, of which 128,480 tons may be alternative raw materials and clay.	The quantity of raw material and clay crushed shall be recorded monthly	
	0200-2-F			
	0200-3-F			
	0200-4-F			
	0200-5-F			
	0200-6-F			
	0200-7-F			
	0200-8-F			
0203-0-F	0203-1-F	365,000 tons of raw material crushed per month	The quantity of raw material crushed shall be recorded monthly.	
0300-0-F	0300-1-F	365,000 tons of raw material crushed per month	The quantity of raw materials crushed shall be recorded monthly.	
	0300-2-F			
	0300-3-F			
	0300-4-F			

Table: Fugitives Subject to Fugitive Dust Rule Only-Operational Limits & Requirements (Cont.)

Emission Point Number	Associated Emission Unit Number	Process Throughput Limit	Reporting & Recordkeeping ⁽¹⁾	Authority for Requirements
0387-F	0387-1-F	365,000 tons of raw material crushed per month	The quantity of raw materials crushed shall be recorded monthly.	Section IV(2) Iowa Department of Natural Resources Administrative Consent Order No. 98-AQ-08

⁽¹⁾ The records shall be kept on site for a minimum of five years, and shall be available for inspection by the Department.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: See Table: Fugitives Subject to 40 CFR 63 Subpart LLL

Associated Equipment

Associated Emission Unit ID Numbers: See Table: Fugitives Subject to 40 CFR 63 Subpart LLL

Applicable Requirements

Table: Fugitives Subject to 40 CFR 63 Subpart LLL

Emission Point Number	Associated Emission Unit Number	Emission Unit Description	Raw Material	Rated Capacity
0400-0-F	0400-1-F	Raw Material Transfer-Weigh Feeders to Conveyor	Raw Materials ⁽¹⁾	300 TPH
0487-0-F	0487-1-F	0487 Slide Gate-Truck Loading	Raw Materials ⁽¹⁾	10 TPH
0488-0-F	0488-1-F	0488 Manual Flop Gate-Truck Loading	Raw Materials ⁽¹⁾	300 TPH
0576-0-F	0576-1-F	0576 Manual Slide Gate Load Out	Clinker	30 TPH
0718-0-F	0718-1-F	Clinker Bin Load Out-Truck Loading	Clinker	180 TPH
0766-0-F	0766-1-F	0766 Feeder Transfer to 0722 Belt Conveyor	Gypsum	180 TPH
0800-0-F	0800-1-F	Finish Mill Building Fugitives	Clinker	180 TPH
	0889-1-F	0886 Belt Conveyor Transfer to 0905 Belt Conveyor	Cement	200 TPH
0906-0-F	0906-1-F	0905 Belt Conveyor Transfer to 0908 Hopper	Cement	200 TPH
0926-0-F	0926-1-F	0914 Belt Conveyor Transfer to 0916 Hopper	Cement	200 TPH
1300-0-F	1300-1-F	Rail Loading System (Fugitives)	Cement	600 TPH
	1300-2-F	Truck Loading System (Fugitives)	Cement	300 TPH
2601-0-F	2601-1-F	Barge Loading System (Fugitives)	Cement	100 TPH

⁽¹⁾ Raw materials refers to any one or a mixture of the kiln-stock materials used to produce cement, which are primarily limestone, clay, or alternative raw materials such as hydrocarbon contaminated soils. Coal and other primary fuel sources are not included in this category.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from these emission points shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 10%

Authority for Requirement: 567 IAC 23.1(4)"bl"
40 CFR 63.1348

Pollutant: Fugitive Dust

Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.

Authority for Requirement: 567 IAC 23.3(2)"c"

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Process throughput: See Table: Fugitives Subject to Subpart LLL-Operational Limits & Requirements

Reporting & Recordkeeping:

- A. Recordkeeping for NESHAP 40 CFR 63 Subpart LLL at the facility shall be done per 40 CFR 63.1355.

Authority for Requirement: 567 IAC 23.1(4)"bl"
40 CFR 63.1355

- B. See Table: Fugitives Subject to 40 CFR 63 Subpart LLL-Operational Limits & Requirements.

Table: Fugitives Subject to 40 CFR 63 Subpart LLL-Operational Limits & Requirements

Emission Point Number	Associated Emission Unit Number	Process Throughput Limit	Reporting & Recordkeeping ⁽¹⁾	Authority for Requirements
0400-0-F	0400-1-F	365,000 tons of raw material crushed per month	The quantity of raw materials crushed shall be recorded monthly.	Section IV(2) Iowa Department of Natural Resources Administrative Consent Order No. 98-AQ-08
0800-0-F	0800-1-F	17,082 tons of gypsum usage per month	The quantity of gypsum used shall be recorded monthly.	
1300-0-F	1300-1-F	262,800 tons of cement production per month	The quantity of cement produced shall be recorded monthly.	
	1300-2-F			
2601-0-F	2601-1-F			

⁽¹⁾ The records shall be kept on site for a minimum of five (5) years, and shall be available for inspection by the Department.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

With the exception of emission points 0400-0-F and 1300-0-F, which are totally enclosed and thus exempt from periodic opacity monitoring, the facility shall check the opacity monthly as described in (a)(4)(i-iv) of **Plant-Wide Conditions-Applicable Limits and Requirements From 40 CFR 63 Subpart LLL-Monitoring Requirements**.

Authority for Requirement - 567 IAC 23.1(4)"bl"
40 CFR 63.1350(a)(4)

Agency Approved Operation & Maintenance Plan Required? Yes ☒ No ☐

Relevant requirements of O & M plan for this equipment: Opacity-see **Appendix B**.

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Authority for Requirement: 567 IAC 23.1(4)"bl"
40 CFR 63.1350(a)"

Emission Point ID Numbers: See Table: Haulroads Subject to Administrative Consent Order No. 98-AQ-08

Associated Equipment

Associated Emission Unit ID Numbers: See Table: Haulroads Subject to Administrative Consent Order No. 98-AQ-08

Applicable Requirements

Table: Haulroads Subject to Administrative Consent Order No. 98-AQ-08

Emission Point Number	Associated Emission Unit Number	Emission Unit Description	Raw Material	Rated Capacity
0155-0-F	0155-1-F	Quarry Haulroad-Rock Hauling	Unpaved Road	16.47 VMT/hr
0160-0-F	0160-1-F	Quarry Haulroad-Clay Hauling	Unpaved Road	2.47 VMT/hr
0165-0-F	0165-1-F	Haulroad-Clay from Storage Piles to Crusher	Unpaved Road	3.31 VMT/hr
0691-0-F	0691-1-F	Haulroad-Rail Unloading Raw Materials	Paved Road	14.77 VMT/hr
0692-0-F	0692-1-F	Haulroad-Rail UnloadingClinker	Paved Road	2.27 VMT/hr
0695-0-F	0695-1-F	Haulroad-Rail Unloading Fuel	Paved Road	4.55 VMT/hr
0765-0-F	0765-1-F	Unpaved Haulroad to 0765 Feeder	Unpaved Road	0.63 VMT/hr
	0765-2-F	Paved Haulroad to 0765 Feeder	Paved Road	0.63 VMT/hr
1301-0-F	1301-1-F	Haulroad-Truck Loadout of Cement	Paved Road	0.93 VMT/hr

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from these emission points shall not exceed the levels specified below.

Pollutant: Fugitive Dust

Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.

Authority for Requirement: 567 IAC 23.3(2)"c"

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Process throughput: See Table: Haulroads Subject to Administrative Consent Order No. 98-AQ-08
Operational Limits & Requirements

Work practice standards: See *Haul Road Fugitive Dust Plan* under Plant-Wide
Conditions.

Reporting & Record keeping:

- A. Records as specified under *Haul Road Fugitive Dust Plan* under Plant-Wide
Conditions shall be kept on site for a minimum of five years. The records shall be
available for inspection upon request by representatives of the Department of Natural
Resources.
- B. See Table: Haulroads Subject to Administrative Consent Order No. 98-AQ-08-
Operational Limits & Requirements

Table: Haulroads Subject to Administrative Consent Order No. 98-AQ-08-Operational Limits
& Requirements

Emission Point Number	Associated Emission Unit Number	Process Throughput Limit	Reporting & Recordkeeping ⁽¹⁾	Authority for Requirements
0155-0-F	0155-1-F	365,000 tons of raw material crushed per month	The quantity of raw materials crushed shall be recorded monthly.	Section IV(2) Iowa Department of Natural Resources Administrative Consent Order No. 98-AQ-08
0160-0-F	0160-1-F	55,480 tons of clay crushed per month	The quantity of clay crushed shall be recorded monthly.	
0165-0-F	0165-1-F	55,480 tons of clay crushed per month	The quantity of clay crushed shall be recorded monthly.	
0691-0-F	0691-1-F	55,480 tons of clay crushed per month	The quantity of clay crushed shall be recorded monthly.	
0692-0-F	0692-1-F	262,800 tons of cement production per month	The quantity of cement produced shall be recorded monthly	
0695-0-F	0695-1-F	32,761 tons of fuel used per month	The quantity of fuel usage shall be recorded monthly.	
0765-0-F	0765-1-F	262,800 tons of cement production per month	The quantity of cement produced shall be recorded monthly	
	0765-2-F			
1301-0-F	1301-1-F	262,800 tons of cement production per month	The quantity of cement produced shall be recorded monthly	

⁽¹⁾ The records shall be kept on site for a minimum of five (5) years, and shall be available for
inspection by the Department.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Authority for Requirement: 567 IAC 22.108(3)"b"

**Emission Point ID Numbers: See Table: Conveying System Transfer Points\
Raw and Finish Mills\ Storage Bins\ Bulk Loading
and Unloading Units Subject to 40 CFR 63
Subpart LLL**

Associated Equipment

Associated Emission Unit ID Numbers: See Table: Conveying System Transfer Points\ Raw and
Finish Mills\ Storage Bins\ Bulk Loading and Unloading
Units Subject to 40 CFR 63 Subpart LLL

Applicable Requirements

Table: Conveying System Transfer Points\ Raw and Finish Mills\ Storage Bins\ Bulk Loading and
Unloading Units Subject to 40 CFR 63 Subpart LLL

Emission Point Number	Associated Emission Unit Number	Emission Unit Description	Control Equipment Number	Control Equipment Description	Raw Material	Rated Capacity
0404-0	0404-1	Raw Material Transfer-Conveyor to Homo. Silos	0404-C	Baghouse	Raw Materials ⁽¹⁾	1,400 TPH
0420-0	0420-1	Raw Material Transfer-Airslides to Vert. Conveyor	0420-C	Baghouse	Raw Materials ⁽¹⁾	300 TPH
0498-0	0498-1	Raw Material Transfer-Conveyors to Preblend Bin	0498-C	Baghouse	Raw Materials ⁽¹⁾	300 TPH
0504-0	0504-1	Raw Material Transfer-Airslides/Separator/Bin to Kiln	0504-C	Baghouse	Raw Materials ⁽¹⁾	300 TPH
0709-0	0709-1	Drag Conveying Clinker	0709-C	Baghouse	Clinker	220 TPH
0743-0	0743-1	Drag Conveying Clinker	0743-C	Baghouse	Clinker	220 TPH
0811-0	0811-1	Finish Mill Holding Bin	0811-C	Baghouse	Cement	180 Tons
0817-0	0817-1	Finish Mill (Particulate Emissions)	0817-C	Baghouse	Clinker, Gypsum	180 TPH
	0817-2	Finish Mill (VOC Emissions)			Grinding Aid	26 gal./hr
0822-0	0822-1	Finish Mill Air Separator	0822-C	Baghouse	Cement	180 TPH
0950-0	0950-1	Barge Loading Silo	0950-C	Baghouse	Cement	100 TPH
1007-0	1007-1	A.E. Silos # 15-30	1007-C	Baghouse	Cement	200 TPH
1017-0	1017-1	Conebottom Silos # 31-40	1017-C	Baghouse	Cement	200 TPH
1041-0	1041-1	Rail Car Loading System-Silo # 41	1041-C	Baghouse	Cement	300 TPH
1044-0	1044-0	North Truck Loading Spout	1044-C	Baghouse	Cement	150 TPH
	1440-03	Airslide Conveyor				150 TPH
	1442-05	Airslide Conveyor				150 TPH

Table: Conveying System Transfer Points\ Raw and Finish Mills\ Storage Bins\ Bulk Loading and Unloading Units Subject to 40 CFR 63 Subpart LLL (cont.)

Emission Point Number	Associated Emission Unit Number	Emission Unit Description	Control Equipment Number	Control Equipment Description	Raw Material	Rated Capacity
1045-0	1045-1	South Bulk Truck Loadout System	1045-C	Baghouse	Cement	150 TPH
1047-0	1047-1	Rail Car Loading System-Silos # 47 & 48	1047-C	Baghouse	Cement	300 TPH
1053-0	1053-1	West Overtrack Silos	1053-C	Baghouse	Cement	200 TPH
2601-0	2601-1	Barge Loading System Spout	2601-C	Baghouse	Cement	250 TPH

⁽¹⁾ Raw materials refers to any one or a mixture of the kiln-stock materials used to produce cement, which are primarily limestone, clay, or alternative raw materials such as hydrocarbon contaminated soils. Coal and other primary fuel sources are not included in this category.

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from these emission points shall not exceed the levels specified in Table: Conveying System Transfer Points\ Raw and Finish Mills\ Storage Bins\ Bulk Loading and Unloading Units Subject to 40 CFR 63 Subpart LLL -Emission Limits

Table: Conveying System Transfer Points\ Raw and Finish Mills\ Storage Bins\ Bulk Loading and Unloading Units Subject to 40 CFR 63 Subpart LLL-Emission Limits.

Emission Point Number	Associated Emission Unit Number	Opacity Limit	PM ₁₀ Limit (lb/hr)	PM Limit (gr/scf)	Construction Permit #
0404-0	0404-1	10 % ⁽¹⁾	3.33	0.1	78-A-229-S3
0420-0	0420-1	10 % ⁽¹⁾	0.56	0.1	78-A-228-S4
0498-0	0498-1	10 % ⁽¹⁾	1.16	0.1	78-A-226-S4
0504-0	0504-1	10 % ⁽¹⁾	2.08	0.1	78-A-230-S4
0709-0	0709-1	10 % ⁽¹⁾	0.64	0.1	80-A-012-S2
0743-0	0743-1	10 % ⁽¹⁾	3.02	0.1	78-A-235-S3
0811-0	0811-1	10 % ⁽¹⁾	0.62	0.1	80-A-013-S3
0817-0	0817-1	10 % ⁽¹⁾	6.17	0.1	78-A-237-S4
	0817-2				
0822-0	0822-1	10% ⁽¹⁾	2.66	0.1	78-A-238-S4
0950-0	0950-1	10 % ⁽¹⁾	2.05	0.1	85-A-050-S2
1007-0	1007-1	10 % ⁽¹⁾	0.60	0.1	76-A-003-S2
1017-0	1017-1	10 % ⁽¹⁾	0.60	0.1	76-A-004-S3
1041-0	1041-1	10 % ⁽¹⁾	0.34	0.1	88-A-076-S2
1044-0	1044-0	10 % ⁽¹⁾	0.52	0.1	86-A-015-S3
	1440-03				
	1442-05				
1045-0	1045-1	10 % ⁽¹⁾	0.52	0.1	86-A-014-S2
1047-0	1047-1	10 % ⁽¹⁾	0.38	0.1	83-A-041-S2
1053-0	1053-1	10 % ⁽¹⁾	1.44	0.1	78-A-242-S5
2601-0	2601-1	10 % ⁽¹⁾	0.38	0.1	85-A-052-S4

Pollutant: Opacity

Emission Limit: 10 %⁽¹⁾

Authority for Requirement: Iowa DNR Construction Permits specified in Table: Authority for

Requirement: Iowa DNR Construction Permits specified in Table: Conveying System Transfer

Points\ Raw and Finish Mills\ Storage Bins\ Bulk Loading and Unloading Units Subject to 40 CFR
63 Subpart LLL -Emission Limits

567 IAC 23.1(4)"bl"

40 CFR 63.1348

⁽¹⁾ If opacity greater than that observed in the initial performance test is viewed other than
startup, shutdown, or malfunction, a stack test may be required to demonstrate compliance
with the particulate standard.

Pollutant: Particulate Matter

Emission Limit: 0.1 gr/scf

Authority for Requirement: Iowa DNR Construction Permits specified in Table: Conveying System
Transfer Points\ Raw and Finish Mills\ Storage Bins\ Bulk Loading and Unloading Units Subject to

40 CFR 63 Subpart LLL -Emission Limits

567 IAC 23.3(2)"a"

Pollutant: PM₁₀

Emission Limit: As specified in Table: Non-Fugitive Sources Subject to 40 CFR 63 Subpart LLL-
Emission Limits

Authority for Requirement: Iowa DNR Construction Permits specified in Table: Conveying System
Transfer Points\ Raw and Finish Mills\ Storage Bins\ Bulk Loading and Unloading Units Subject to
40 CFR 63 Subpart LLL -Emission Limits

Operational Limits & Requirements

*The owner/operator of this equipment shall comply with the operational limits and requirements
listed below.*

Reporting & Record keeping:

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall
be available for inspection by the DNR. Records shall be legible and maintained in an orderly
manner. The records shall show the following:

Recordkeeping for NESHAP 40 CFR 63 Subpart LLL at the facility shall be done per 40 CFR
63.1355

Authority for Requirement: Iowa DNR Construction Permits specified in Table: Non-Fugitive
Sources Subject to 40 CFR 63 Subpart LLL-Emission Limits

567 IAC 23.1(4)"bl"

40 CFR 63.1355

Emission Point Characteristics

These emission points shall conform to the conditions specified in Table: Non-Fugitive Sources Subject to 40 CFR 63 Subpart LLL-Emission Point Characteristics

Table: Non-Fugitive Sources Subject to 40 CFR 63 Subpart LLL-Emission Point Characteristics

Emission Point Number	Emission Unit Number	Construction Permit #	Stack Characteristics				
			Height (ft.)	Diameter (inches)	Exhaust Flowrate (scfm)	Exhaust Temp. (°F)	Discharge Style
0404-0	0404-1	78-A-229-S3	133	25 X 46	19,500	70	Vertical, Unobstructed
0420-0	0420-1	78-A-228-S4	97	12 x 18	2,700	200	Vertical, Unobstructed
0498-0	0498-1	78-A-226-S4	35.3	15 x 26	6,800	70	Horizontal
0504-0	0504-1	78-A-230-S4	322	21 x 29	10,500	150	Vertical, Unobstructed
0709-0	0709-1	80-A-012-S2	101	11.5 x 20	3,800	70	Horizontal
0743-0	0743-1	78-A-235-S3	208	26 X 38	17,600	70	Horizontal
0811-0	0811-1	80-A-013-S3	116.5	56	2,900	200	Vertical, Unobstructed
0817-0	0817-1	78-A-237-S4	116.5	21 X 52	28,900	200	Vertical, Unobstructed
	0817-2						
0822-0	0822-1	78-A-238-S4	116.5	36 X 29	12,400	200	Vertical, Unobstructed
0950-0	0950-1	85-A-050-S2	96	12 X 18	9,600	200	Horizontal
1007-0	1007-1	76-A-003-S2	105	10.5 x 12	3,000	150	Horizontal
1017-0	1017-1	76-A-004-S3	105	17 x 20	2,800	200	Horizontal
1041-0	1041-1	88-A-076-S2	30	8	2,000	70	Horizontal
1044-0	1044-0	86-A-015-S3	49.3	12 x 18	3,000	70	Horizontal
	1440-03						
	1442-05						
1045-0	1045-1	86-A-014-S2	54.3	12 x 18	3,000	70	Horizontal
1047-0	1047-1	83-A-041-S2	20	8	2,200	70	Horizontal
1053-0	1053-1	78-A-242-S5	140	21	7,300	150	Horizontal
2601-0	2601-0	85-A-052-S4	42	12.75 X 11	2,000	70	Horizontal

Authority for Requirement: Conveying System Transfer Points\ Raw and Finish Mills\ Storage Bins\ Bulk Loading and Unloading Units Subject to 40 CFR 63 Subpart LLL –Emission Point Characteristics.

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements

The facility shall check the opacity as described in (a)(4)(i-vii) and (e) of **Appendix C-Applicable Limits and Requirements From 40 CFR 63 Subpart LLL-Monitoring Requirements**.

Authority for Requirement: Iowa DNR Construction Permits specified in Table: Non-Fugitive Sources Subject to 40 CFR 63 Subpart LLL-Emission Limits
567 IAC 23.1(4)"bl"
40 CFR 63.1350(a)(4)
40 CFR 63.1350(e)

Stack Testing: For Emission Point 2601-0 only

Pollutant – Opacity

Stack Test to be Completed by (date) – See Condition(s) under Compliance Plan, above.

Test Method – 40 CFR 60 Appendix A, Method 9

Authority for Requirement - Iowa DNR Construction Permit 85-A-052-S4

Pollutant – PM₁₀

Stack Test to be Completed by (date) – See Condition(s) under Compliance Plan, above.

Test Method – 40 CFR 51, Appendix M, 201A with 202

Authority for Requirement - Iowa DNR Construction Permit 85-A-052-S4

The owner of this equipment or the owner's authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)

Agency Approved Operation & Maintenance Plan Required? Yes ☒ No ☐

Relevant requirements of O & M plan for this equipment: Particulate Matter and Opacity-
see Appendix B.

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Authority for Requirement: 567 IAC 23.1(4)"bl"
40 CFR 63.1350(a)

Emission Point ID Number: 0020-0

Associated Equipment

Associated Emission Unit ID Numbers: 0020-1

Applicable Requirements

Emission Unit vented through this Emission Point: 0020-1

Emission Unit Description: Emergency Generator

Raw Material/Fuel: #2 Fuel Oil

Rated Capacity: 250 KWH

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limits: 40 %

Authority for Requirement: Iowa DNR Construction Permit 99-A-136
567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (PM)

Emission Limit(s): 0.6 lb./MMBtu

Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: PM₁₀

Emission Limits: 0.74 lb./hr

Authority for Requirement: Iowa DNR Construction Permit 99-A-136

Pollutant: Sulfur Dioxide (SO₂)

Emission Limit(s): 2.5 lb./MMBtu

Authority for Requirement: Iowa DNR Construction Permit 99-A-136
567 IAC 23.3(3)"b"

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Hours of operation: This emission unit shall operate no more than 500 hours per year.

Process throughput: The fuel used shall not have a sulfur content greater than 0.5%.

Reporting & Record keeping: All records as required below shall be satisfactory for demonstrating compliance with all applicable operating limits.

Records shall be maintained on site for five (5) years and be available for inspection upon request by representatives of the Department of Natural Resources. These records shall show the following:

- A. the date, type of fuel used, sulfur content of the fuel, time of startup, time of shutdown, and the total hours the emission unit operated that day.
- B. during the first twelve (12) months of operation, determine the total hours of operation for each month of operation.
- C. after the first twelve (12) months of operation, the annual hours of operation shall be recorded on a rolling 12-month basis for each month of operation.

Authority for Requirement: Iowa DNR Construction Permit 99-A-136

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height (feet): 14

Stack Diameter (inches): 6

Stack Exhaust Flow Rate (scfm): 200

Stack Temperature (°F): 500

Vertical, Unobstructed Discharge Required: Yes ☒ No ☐

Authority for Requirement: Iowa DNR Construction Permit 99-A-136

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 0030-0

Associated Equipment

Associated Emission Unit ID Numbers: 0030-1

Applicable Requirements

Emission Unit vented through this Emission Point: 0030-1

Emission Unit Description: Diesel Water Pump

Raw Material/Fuel: #2 Fuel Oil

Rated Capacity: 182 hp/hr

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limits: 40 %⁽¹⁾

Authority for Requirement: Iowa DNR Construction Permit 99-A-137

567 IAC 23.3(2)"d"

⁽¹⁾If an opacity > 20% is observed other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Pollutant: Particulate Matter (PM)

Emission Limit(s): 0.1 gr./dscf

Authority for Requirement: 567 IAC 23.3(2)"a"

Pollutant: PM₁₀

Emission Limits: 0.43 lb./hr

Authority for Requirement: Iowa DNR Construction Permit 99-A-137

Pollutant: Sulfur Dioxide (SO₂)

Emission Limit(s): 2.5 lb./MMBtu

Authority for Requirement: Iowa DNR Construction Permit 99-A-137

567 IAC 23.3(3)"b"

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Hours of operation: This emission unit shall operate no more than 500 hours per year.

Process throughput: The fuel used shall not have a sulfur content greater than 0.5%.

Reporting & Record keeping: All records as required below shall be satisfactory for demonstrating compliance with all applicable operating limits.

Records shall be maintained on site for five (5) years and be available for inspection upon request by representatives of the Department of Natural Resources. These records shall show the following:

- A. the date, type of fuel used, sulfur content of the fuel, time of startup, time of shutdown, and the total hours the emission unit operated that day.
- B. during the first twelve (12) months of operation, determine the total hours of operation for each month of operation.
- C. after the first twelve (12) months of operation, the annual hours of operation shall be recorded on a rolling 12-month basis for each month of operation.

Authority for Requirement: Iowa DNR Construction Permit 99-A-137

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height (feet): 12.75

Stack Diameter (inches): 6

Stack Exhaust Flow Rate (scfm): 800

Stack Temperature (°F): 500

Vertical, Unobstructed Discharge Required: Yes ☒ No ☐

Authority for Requirement: Iowa DNR Construction Permit 99-A-137

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 0081-0

Associated Equipment

Associated Emission Unit ID Numbers: 0081-1
Emissions Control Equipment ID Number: 0081-C
Emissions Control Equipment Description: Bag Filter

Applicable Requirements

Emission Unit vented through this Emission Point: 0081-1
Emission Unit Description: Quarry Drill
Raw Material/Fuel: N/A
Rated Capacity: N/A

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity
Emission Limits: 40 %⁽¹⁾
Authority for Requirement: Iowa DNR Construction Permit 87-A-080-S2
567 IAC 23.3(2)"d"

⁽¹⁾If visible emissions are observed other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Pollutant: Particulate Matter (PM)
Emission Limit(s): 0.1 gr./scf
Authority for Requirement: Iowa DNR Construction Permit 87-A-080-S2
567 IAC 23.3(2)"a"

Pollutant: PM₁₀
Emission Limits: 0.13 lb./hr
Authority for Requirement: Iowa DNR Construction Permit 87-A-080-S2

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height (feet): 8
Stack Diameter (feet): 0.67
Stack Exhaust Flow Rate (scfm): 2,700
Stack Temperature (°F): 70
Vertical, Unobstructed Discharge Required: Yes ☒ No ☐
Authority for Requirement: Iowa DNR Construction Permit 87-A-080-S2

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 0203-0

Associated Equipment

Associated Emission Unit ID Numbers: 0203-1
Emissions Control Equipment ID Number: 0203-C
Emissions Control Equipment Description: Baghouse

Applicable Requirements

Emission Unit vented through this Emission Point: 0203-1
Emission Unit Description: Raw Material Transfer in Transfer House-Conveyor to Conveyor
Raw Material/Fuel: Raw Materials⁽¹⁾
Rated Capacity: 1,400 TPH

⁽¹⁾ Raw materials refers to any one or a mixture of the kiln-stock materials used to produce cement, which are primarily limestone, clay, or alternative raw materials such as hydrocarbon contaminated soils. Coal and other primary fuel sources are not included in this category.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity
Emission Limit(s): 40%⁽¹⁾
Authority for Requirement: Iowa DNR Construction Permit 78-A-221-S6
567 IAC 23.3(2)"d"

⁽¹⁾ Per DNR Air Quality Policy 3-b-08, Opacity Limits, an exceedence of the indicator opacity of (10%) will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. The permit holder shall also file an "indicator opacity exceedence report" with the DNR field office and keep records as required in the policy. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter
Emission Limits: 0.1 gr./dscf
Authority for Requirement: Iowa DNR Construction Permit 78-A-221-S6
567 IAC 23.3(2)"a"

Pollutant: PM₁₀
Emission Limits: 0.72 lb./hr
Authority for Requirement: Iowa DNR Construction Permit 78-A-221-S6

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Process throughput: This process is limited to transferring 365,000 tons of raw materials per month.

Reporting & Record keeping: The quantity of raw material transferred to the crusher shall be recorded monthly, records shall be kept on site for a minimum of five years, and shall be available for inspection by the Department.

Authority for Requirement: Section IV(2) Iowa Department of Natural Resources
Administrative Consent Order No. 98-AQ-08

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height (feet): 5.6

Stack Diameter (inches): 7.8

Stack Exhaust Flow Rate (scfm): 4,200

Stack Temperature (°F): Ambient

Vertical, Unobstructed Discharge Required: Yes ☒ No ☐

Authority for Requirement: Iowa DNR Construction Permit 78-A-221-S6

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes ☒ No ☐

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six(6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5

years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 0218-0

Associated Equipment

Associated Emission Unit ID Numbers: 0218-1
Emissions Control Equipment ID Number: 0218-C
Emissions Control Equipment Description: Baghouse

Applicable Requirements

Emission Unit vented through this Emission Point: 0218-1
Emission Unit Description: Crushing and Conveying of Raw Materials
Raw Material/Fuel: Raw Materials⁽¹⁾
Rated Capacity: 1,400 TPH

⁽¹⁾ Raw materials refers to any one or a mixture of the kiln-stock materials used to produce cement, which are primarily limestone, clay, or alternative raw materials such as hydrocarbon contaminated soils. Coal and other primary fuel sources are not included in this category.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity
Emission Limit(s): 40%⁽¹⁾
Authority for Requirement: Iowa DNR Construction Permit 78-A-218-S6
567 IAC 23.3(2)"d"

⁽¹⁾ Per DNR Air Quality Policy 3-b-08, Opacity Limits, an exceedence of the indicator opacity of (10%) will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. The permit holder shall also file an "indicator opacity exceedence report" with the DNR field office and keep records as required in the policy. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter
Emission Limits: 0.1 gr./dscf
Authority for Requirement: Iowa DNR Construction Permit 78-A-218-S6
567 IAC 23.3(2)"a"

Pollutant: PM₁₀
Emission Limits: 5.59 lb./hr
Authority for Requirement: Iowa DNR Construction Permit 78-A-218-S6

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Process throughput:

The following supplemental materials may be utilized in the crushers as listed below:

<u>Material</u>	<u>Maximum Tons Per Hour</u>
1. Coal Combustion Residue	55
2. Foundry By-Products	1300
3. Hydrocarbon Containing Soils	210
4. Refinery By-Products	105
5. Oils and Greases	0
<u>Total Feed</u>	1300

Reporting & Record keeping: All records, as required by this permit, shall be kept on site for a minimum of five (5) years and be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. The records shall show the following:

Materials utilized by the crushers. This record shall show the individual material, the amount of that material (in tons), the percentage of the total for that material, and the total of all materials (in tons/hr).

Authority for Requirement: Iowa DNR Construction Permit 78-A-218-S6

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height (feet): 4

Stack Opening (inches): 12 x 30

Stack Exhaust Flow Rate (scfm): 32,600

Stack Temperature (°F): Ambient

Discharge Style: Horizontal

Authority for Requirement: Iowa DNR Construction Permit 78-A-218-S6

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes ☒ No ☐

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six(6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 0327-0-F

Associated Equipment

Associated Emission Unit ID Numbers: 0327-1-F

Applicable Requirements

Emission Unit vented through this Emission Point: 0327-1

Emission Unit Description: Raw Material Transfer-Vibrating Feeder to Conveyor

Raw Material/Fuel: Raw Materials⁽¹⁾

Rated Capacity: 250 TPH

⁽¹⁾ Raw materials refers to any one or a mixture of the kiln-stock materials used to produce cement, which are primarily limestone, clay, or alternative raw materials such as hydrocarbon contaminated soils. Coal and other primary fuel sources are not included in this category.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 10%⁽¹⁾

Authority for Requirement: Iowa DNR Construction Permit 78-A-223-S4
567 IAC 23.3(2)"d"

⁽¹⁾ If opacity greater than that observed in the initial performance test is viewed other than startup, shutdown, or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Pollutant: Particulate Matter

Emission Limits: 0.1 gr/dscf

Authority for Requirement: Iowa DNR Construction Permit 78-A-223-S4
567 IAC 23.3(2)"a"

Pollutant: PM₁₀

Emission Limits: 0.34 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 78-A-223-S4

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height (feet): Vents into preblend storage dome

Stack Diameter (inches): Vents into preblend storage dome

Stack Exhaust Flow Rate (acfm): Vents into preblend storage dome

Stack Temperature (°F): Vents into preblend storage dome

Authority for Requirement: Iowa DNR Construction Permit 78-A-223-S4

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 0466-0

Associated Equipment

Associated Emission Unit ID Numbers: 0466-1, 0466-2
Emissions Control Equipment ID Number: 0466-C, 0594-C
Emissions Control Equipment Description: Baghouses
Continuous Emissions Monitors ID Numbers: 0466-1-M, 0466-2-M

Applicable Requirements

Emission Unit vented through this Emission Point: 0466-1
Emission Unit Description: Preheater/Precalciner/Kiln/Raw Mill System
Raw Material/Fuel: Raw Materials⁽¹⁾ and Coal
Rated Capacity: 145.3 tons clinker/hr.

Emission Unit vented through this Emission Point: 0466-2
Emission Unit Description: Alkali Bypass
Raw Material/Fuel: N/A
Rated Capacity: N/A

⁽¹⁾ Raw materials refers to any one or a mixture of the kiln-stock materials used to produce cement, which are primarily limestone, clay, or alternative raw materials such as hydrocarbon contaminated soils. Coal and other primary fuel sources are not included in this category.

BACT Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity
Emission Limit(s): 10%
Authority for Requirement: Iowa DNR Construction Permit 99-A-579-P1

Pollutant: Particulate Matter
Emission Limit(s): 0.516 lb./ton of clinker⁽²⁾
Authority for Requirement: Iowa DNR Construction Permit 99-A-579-P1

Pollutant: PM₁₀
Emission Limit(s): 0.516 lb./ton of clinker⁽²⁾
Authority for Requirement: Iowa DNR Construction Permit 99-A-579-P1

Pollutant: Sulfur Dioxide (SO₂)
Emission Limit(s): 4,850 tons/yr ^(2,3,4)
Authority for Requirement: Iowa DNR Construction Permit 99-A-579-P1

Pollutant: Nitrogen Oxides (NO_x)

Emission Limit(s): 2,546 tons/yr ^(2,3,4), 4.0 lb./ton of clinker ^(3,5)

Authority for Requirement: Iowa DNR Construction Permit 99-A-579-P1

Pollutant: Carbon Monoxide (CO)

Emission Limit(s): 4.5 lb./ton of clinker⁽²⁾

Authority for Requirement: Iowa DNR Construction Permit 99-A-579-P1

⁽²⁾ After completion of construction.

⁽³⁾ Compliance with the applicable emission standards of this permit are based on the CEM data from the owner/operator. Hourly emissions shall be the average of four 15-minute averages analyzed and recorded by the CEM.

⁽⁴⁾ Limit is a 12-month rolling total. Applies at all times including periods of startup, shutdown, or malfunction.

⁽⁵⁾ Limit is a monthly rolling average. Limit does not apply during startup, shutdown, or malfunction. Compliance with this emission standard shall be calculated by the owner/operator by:

- Totaling the pounds of NO_x recorded by the CEMS during normal operation over the last twelve months of operation.
- Totaling the tons of clinker produced over the last twelve months operation.
- Dividing the pounds of NO_x by the tons of clinker produced.

Other Emission Limits

Pollutant: Particulate Matter

Emission Limit(s): 0.3 lb./ton of feed

Authority for Requirement: Iowa DNR Construction Permit 99-A-579-P1

567 IAC 23.1(4)"bl"

40 CFR 63.1343(b)(1)

Pollutant: PM₁₀

Emission Limit(s): 75 lb./hr

Authority for Requirement: Iowa DNR Construction Permit 99-A-579-P1

Pollutant: Sulfur Dioxide (SO₂)

Emission Limit(s): 2,900 lb./hr⁽⁵⁾ 66,500 lbs/day ^(6,7)

Authority for Requirement: Iowa DNR Construction Permit 99-A-579-P1

Pollutant: Nitrogen Oxides (NO_x) ⁽⁸⁾

Emission Limit(s): 465.65 lb./hr

Authority for Requirement: U.S. EPA PSD Permit 82-04-005

Pollutant: Dioxins and Furans (D/F)

Emission Limit(s): 0.4 ng./dscm (1.7E-10 gr./dscf) (TEQ) ⁽⁹⁾

Authority for Requirement: Iowa DNR Construction Permit 99-A-579-P1

567 IAC 23.1(4)"bl"

40 CFR 63.1343(b)(3)

⁽⁶⁾ Compliance with the applicable emission standards of this permit are based on the CEM data from the owner/operator. Hourly emissions shall be the average of four 15-minute averages analyzed and recorded by the CEM.

⁽⁷⁾ Limit is a 24-hour rolling total. Applies at all times including periods of startup, shutdown, or malfunction.

⁽⁸⁾ Limit only when clinker production is at or below 108 TPH.

⁽⁹⁾ Limit is corrected to 7% oxygen and when the average of the performance test run average temperatures at the inlet to the particulate matter control device is 204 °C (400 °F) or less. If the average of the performance test run average temperatures at the inlet to the particulate matter control device is greater than 204 °C (400 °F) then the D/F standard is 0.2 ng/dscm (8.7 E-11 gr./dscf)(TEQ) corrected to 7% oxygen.

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Operating Limits:

- A. The kiln is limited to firing on used oil as defined by 40 CFR 279, fuel oil, natural gas, coal, and coke.
- B. The following supplemental materials may be utilized by the roller mill and kiln as listed below:

<u>Material</u>	<u>MAXIMUM TONS PER HOUR</u>	
	<u>Roller Mill</u>	<u>Kiln</u>
1. Coal Combustion Residue	30	30
2. Foundry By-Products	30	30
3. Hydrocarbon Containing Soils	46	46
4. Refinery By-Products	30	30
5. Oils and Greases	0	2
Total Feed	300	300

- C. Simultaneous feeding of the alternative materials listed in B, above, is allowed, but the combined total of the materials shall not exceed twenty (20) percent of the total material being fed into the kiln at any given time. Refer to 40 CFR 63.1349(e) for performance testing requirements.
- D. In accordance with 40 CFR 60 Subpart F (Standards of Performance for Portland Cement Plants), the facility (plant number 82-04-005) shall record its daily production rates and kiln feed rates.
- E. The kiln shall be operated such that the temperature of the gas at the inlet to the kiln particulate matter control device (PMCD) and alkali bypass PMCD, if applicable, meets the requirements of 40 CFR 63.1344 (Subpart LLL-National Emission Standards for Hazardous Air Pollutants from the Portland Cement Manufacturing Industry)

- F. In accordance with 40 CFR 63.1349(c), PM performance tests shall be repeated every five years.
- G. In accordance with 40 CFR 63.1349(d), D/F performance tests shall be repeated every 30 months.

Reporting & Record keeping: All records, as required below, shall be satisfactory for demonstrating compliance with all applicable operating limits.

Records shall be maintained on site for five (5) years and be available for inspection upon request by representatives of the Department of Natural Resources. These records shall show the following:

- A. The sulfur content (in lb./MMBtu) of all individual fuels and the total sulfur (in lb./MMBtu) of any combination of fuels that are fired in the kiln. The fuel analysis sent with the fuel shipment can be an adequate demonstration for this record.
- B. The Pb content of each batch of used oil fired in the kiln. The fuel analysis sent with the fuel shipment can be an adequate demonstration for this record.
- C. The daily kiln production rates and kiln feed rates.
- D. Copies of the semiannual excess emissions reports per 40 CFR 60.65.
- E. Materials utilized by the roller mill and kiln. This record shall show the individual material, the amount of that material (in tons/hr), the percentage of the total for that material, the total of all materials (in tons/hr), and whether the roller mill or kiln or both were utilizing the material.
- F. Determine the total SO₂ emissions for each operating day. An operating day is defined as a 24-hour period between 12:00 midnight and the following midnight during which any clinker is produced at any time in the kiln. It is not necessary for clinker to be produced continuously by the kiln for the entire 24-hour period.
- G. Upon issuance of Iowa DNR Construction Permit 99-A-579-P1 and prior to the kiln modification, Lafarge shall calculate the monthly rolling average for the pounds of NO_x/ton of clinker emission limit for the previous full 12 months. Lafarge shall continue to determine the 12-month rolling average each month thereafter.
- H. After the kiln modification, Lafarge shall restart the calculation for the monthly rolling average for the pounds of NO_x/ton of clinker. The calculation shall start the first full month after the modification to the kiln and Lafarge shall continue to determine the monthly rolling average for each month thereafter.
- I. Upon issuance of DNR Construction Permit 99-A-579-P1 calculate the total NO_x emissions for the twelve (12) months previous to the issuance of the permit.
- J. After the issuance of Iowa DNR Construction Permit 99-A-579-P1, determine the annual NO_x emissions on a rolled 12-month total for each month of operation.

- K. For the first twelve months after the kiln modification, calculate the cumulative SO_x emissions for each month of operation.
- L. After the first twelve months after the kiln modification, calculate the cumulative SO_x emissions on a rolling 12-month total for each month of operation.
- M. Monitoring for NESHAP Subpart LLL at the facility shall be done per 40 CFR 63.1350.
- N. Recordkeeping requirements for NESHAP Subpart LLL at the facility shall be done per 40 CFR 63.1355.

Authority for Requirement: Iowa DNR Construction Permit 99-A-579-P1

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height (feet): 340

Stack Diameter (inches): 108

Stack Exhaust Flow Rate (scfm): 215,000

Stack Temperature (°F): 300

Vertical, Unobstructed Discharge Required: Yes ☒ No ☐

Authority for Requirement: Iowa DNR Construction Permit 99-A-579-P1

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Stack Testing:

Pollutant – Particulate Matter (PM) (NESHAP)

Stack Test to be Completed by (date) – June 4, 2007

Test Method - 40 CFR 60, Appendix A, Method 5

Authority for Requirement - 40 CFR 63.1349(c)

567 IAC 23.1(4)"bl"

Pollutant - CO

Stack Test to be Completed by (date) – Within 60 to 180 days after completion of modifications

Test Method - 40 CFR 60, Appendix A, Method 10⁽²⁾

Authority for Requirement - Iowa DNR Construction Permit 99-A-579-P1

Pollutant - Dioxins/Furans (D/F)

Stack Tests to be Completed by (date) – December 4, 2005 and June 4 2008⁽³⁾

Test Method - 40 CFR 60, Appendix A, Method 23 ⁽⁴⁾

Authority for Requirement - Iowa DNR Construction Permit 99-A-579-P1

40 CFR 63.1349(b)(3)

567 IAC 23.1(4)"bl"

⁽¹⁾ Or approved alternate

⁽²⁾ The CO compliance tests shall be conducted under the same operating and combustion conditions as the NOx CEMS certification tests. Compliance with the NOx BACT emission limit shall take preference if difficulties are encountered in achieving simultaneous compliance with these BACT emission limits. If such difficulties are encountered, the owner may subsequently request a revision of the CO BACT limit.

⁽³⁾ And every 30 months thereafter.

⁽⁴⁾ Test shall be done in order to meet compliance as outlined in 40 CFR 63.1349.

Continuous Emissions Monitoring:

In accordance with the New Source Performance Standards (NSPS) Subpart F (Standards of Performance for Portland Cement Plants), the facility (plant number 82-04-005) shall install, calibrate, maintain, and operate a continuous emission monitoring system (CEMS) for measuring the opacity of the emissions discharged to the atmosphere and record the output of the system. The system shall be designed to meet the 40 CFR 60, Appendix B, Performance Specification 1 (PS1).

Compliance with the sulfur dioxide emission limits of this permit shall be continuously demonstrated by the owner/operator through the use of a CEMS. Therefore, the facility (plant number 82-04-005) shall install, calibrate, maintain, and operate a CEMS for measuring sulfur dioxide emissions discharged to the atmosphere and record the output of the system. The system shall be designed to meet the 40 CFR 60, Appendix B, Performance Specification 2 (PS2) and Performance Specification 6 (PS6) requirements. The specifications of 40 CFR 60 Appendix F (Quality Assurance/Quality Control) shall apply. Appendix F requirements shall be supplemented with a quarterly notice to the Department with the dates of the quarterly cylinder gas audits and annual relative accuracy test audit.

Compliance with the nitrogen oxide emission limits of this permit shall be continuously demonstrated by the owner/operator through the use of a CEMS. Therefore, the facility (plant number 82-04-005) shall install, calibrate, maintain, and operate a CEMS for measuring nitrogen oxides emissions discharged to the atmosphere and record the output of the system. The system shall be designed to meet the 40 CFR 60, Appendix B, Performance Specification 2 (PS2) and Performance Specification 6 (PS6) requirements. The specifications of 40 CFR 60 Appendix F (Quality Assurance/Quality Control) shall apply. Appendix F requirements shall be supplemented

with a quarterly notice to the Department with the dates of the quarterly cylinder gas audits and annual relative accuracy test audit.

The CEMS required by this permit shall be operated and data recorded during all periods of operation of the kiln except for CEM breakdowns and repairs. Data is recorded during calibration checks, and zero and span adjustments.

The 1-hour average sulfur dioxide and nitrogen dioxide emission rates measured by the CEMS required by this permit shall be used to calculate compliance with the emission standards of this permit. At least 2 data points must be used to calculate each 1-hour average.

The owner or operator shall obtain emission data for at least 90% of the hours in a day for a monitor day. In addition, the owner or operator shall obtain emission data in at least 22 out of 30 successive kiln operating days. For each hour of missing sulfur dioxide or nitrogen dioxide emission data, the owner or operator shall substitute data by averaging the hourly SO₂ or NO_x emission rate recorded for the kiln operating hour immediately before and the kiln operating hour immediately after the missing data point for each hour of missing data. For each day of missing sulfur dioxide or nitrogen dioxide emission data, the owner or operator shall substitute the highest value from the previous 30 days of SO₂ or NO_x emission data for each day of missing data.

Failure to obtain 90% of the hours per day will require Lafarge to obtain actual emission data by alternative testing or monitoring.

Authority for Requirement - Iowa DNR Construction Permit 99-A-579-P1

The owner of this equipment or the owner's authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)

Agency Approved Operation & Maintenance Plan Required? Yes ☒ No ☐

Relevant requirements of O & M plan for this equipment: Particulate Matter and Opacity
see Appendix B.

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Authority for Requirement: 567 IAC 22.108(3)"b"
567 IAC 23.1(4)"bl"
40 CFR 63 1350(a)

Emission Point ID Number: 0499-0

Associated Equipment

Associated Emission Unit ID Numbers: 0499-1-F

Applicable Requirements

Emission Unit vented through this Emission Point: 0499-1-F

Emission Unit Description: Fuel Oil Tank

Raw Material/Fuel: 20,000 gal Fuel Oil Tank

Rated Capacity: 2,400 gal/hr

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40%⁽¹⁾

Authority for Requirement: Iowa DNR Construction Permit 98-A-1055-S1
567 IAC 23.3(2)"d"

⁽¹⁾If visible emissions exceed the indicator opacity (25%) other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Pollutant: Particulate Matter

Emission Limits: 0.1 gr./scf

Authority for Requirement: Iowa DNR Construction Permit 98-A-1055-S1
567 IAC 23.3(2)"a"

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Process throughput: The storage tank is limited to storing distillate fuel oil.

Reporting & Record keeping: All records, as required below, shall be satisfactory for demonstrating compliance with all applicable operating limits. Records of the fuel type must be maintained onsite for at least five (5) years, and the records showing the tank dimensions and capacity must be maintained onsite for the lifetime of the tank. These records are to be made available to DNR upon request.

The owner or operator of the equipment shall maintain the following records:

- A. the type of fuel stored in the tank.

B. records showing the dimensions of the storage vessel and the capacity.

Authority for Requirement: Iowa DNR Construction Permit 98-A-1055-S1
567 IAC 23.1(2)"ddd"
40 CFR 60.116b(b)

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Source: Storage Tank

Tank Shell Diameter: 11 ft

Tank Shell Height: 28 ft

Tank Volume (Gallons): 20,000

Exhaust Flow Rate: Fugitive

Authority for Requirement: Iowa DNR Construction Permit 98-A-1055-S1

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 0535-0**Associated Equipment**

Associated Emission Unit ID Numbers: 0535-1

Emissions Control Equipment ID Number: 0535-C

Emissions Control Equipment Description: Baghouse

Applicable Requirements

Emission Unit vented through this Emission Point: 0535-1

Emission Unit Description: CKD Handling Silo

Raw Material/Fuel: CKD

Rated Capacity: 405 TPH

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40%⁽¹⁾

Authority for Requirement: Iowa DNR Construction Permit 97-A-789-S2
567 IAC 23.3(2)"d"

⁽¹⁾ If opacity greater than that observed in the initial performance test is viewed other than startup, shutdown, or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Pollutant: Particulate Matter

Emission Limits: 0.1 gr./scf

Authority for Requirement: Iowa DNR Construction Permit 97-A-789-S2
567 IAC 23.3(2)"a"

Pollutant: PM₁₀

Emission Limits: 0.55 lb./hr

Authority for Requirement: Iowa DNR Construction Permit 97-A-789-S2

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height (feet): 102

Stack Diameter (inches): 16 x 7

Stack Exhaust Flow Rate (scfm): 2,900

Stack Temperature (°F): 140

Vertical, Unobstructed Discharge Required: Yes ☒ No ☐

Authority for Requirement: Iowa DNR Construction Permit 97-A-789-S2

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes ☒ No ☐

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six(6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 0611-0

Associated Equipment

Associated Emission Unit ID Number: 0611-1
Emissions Control Equipment ID Number: 0611-C
Emissions Control Equipment Description: Baghouse
Continuous Emissions Monitors ID Number: 0611-1-M

Applicable Requirements

Emission Unit vented through this Emission Point: 0611-1
Emission Unit Description: Clinker Cooler and Drag Conveyor
Raw Material/Fuel: Clinker
Rated Capacity: 145.3 TPH

BACT Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity
Emission Limit(s): 5%⁽¹⁾
Authority for Requirement: Iowa DNR Construction Permit 01-A-878-P

⁽¹⁾ The averaging period for this standard is one (1) hour.

Pollutant: Particulate Matter
Emission Limit(s): 0.015 gr./dscf
Authority for Requirement: Iowa DNR Construction Permit 01-A-878-P1

Pollutant: PM₁₀
Emission Limit(s): 0.015 gr./dscf
Authority for Requirement: Iowa DNR Construction Permit 01-A-878-P1

Other Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity
Emission Limit(s): 10%
Authority for Requirement: Iowa DNR Construction Permit 01-A-878-P
567 IAC 23.1(4)"bl"
40 CFR 63.1345

Pollutant: Particulate Matter

Emission Limit(s): 0.1 lb./ton feed

Authority for Requirement: Iowa DNR Construction Permit 01-A-878-P
567 IAC 23.1(4)"bl"
40 CFR 63.1345

Pollutant: PM₁₀

Emission Limit(s): 17.92 lb./hr

Authority for Requirement: Iowa DNR Construction Permit 01-A-878-P

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Control equipment parameters: The facility is required to conduct a PM₁₀ compliance test within thirty (30) days if it exceeds the one (1) hour, 5% BACT opacity limit.

Reporting & Record keeping: All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. The records shall show the following:

- A. Copies of the excess emissions reports required per NSPS 40 CFR 60 Subpart F and NESHAP 40 CFR 63 Subpart LLL
- B. Monitoring for NESHAP 40 CFR 63 Subpart LLL at the facility (plant number 17-01-005) shall be done per 40 CFR §63.1350
- C. Recordkeeping for NESHAP 40 CFR Subpart LLL at the facility (plant number 17-01-005) shall be done per 40 CFR 63.1355
- D. A log of one (1) hour opacity averages, dates & times of exceedences, and dates of PM₁₀ compliance tests.

Authority for Requirement: Iowa DNR Construction Permit 01-A-878-P

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height (feet): 113

Stack Diameter (inches): 126

Stack Exhaust Flow Rate (scfm): 133,000

Stack Temperature (°F): 340

Vertical, Unobstructed Discharge Required: Yes ☒ No ☐

Authority for Requirement: Iowa DNR Construction Permit 01-A-878-P

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Stack Testing:

Pollutant – Particulate Matter (PM) (NESHAP)
Stack Test to be Completed by (date) – June 4, 2007
Test Method - 40 CFR 60, Appendix A, Method 5
Authority for Requirement - 40 CFR 63.1349(c)
567 IAC 23.1(4)"bl"

Continuous Emissions Monitoring:

Pollutant - Opacity
Operational Specifications – 40 CFR 63 Subpart A and 40 CFR 60, Appendix B PS-1
Date of Initial System Calibration and Quality Assurance – August 14, 1997
Ongoing System Calibration/Quality Assurance - 40 CFR 63 Subpart A and 40 CFR 60, Appendix B PS-1
Reporting & Record keeping - 40 CFR 63 Subpart A and 40 CFR 60, Appendix B PS-1
Authority for Requirement – Iowa DNR Construction Permit 01-A-878-P
567 IAC 23.1(3)"bl"
40 CFR 63.1350(d)

The owner of this equipment or the owner's authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)

Agency Approved Operation & Maintenance Plan Required? Yes ☒ No ☐

Relevant requirements of O & M plan for this equipment: Particulate Matter and Opacity
see Appendix B.

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Authority for Requirement: 567 IAC 22.108(3)"b"
567 IAC 23.1(4)"bl"
40 CFR 63 1350(a)

Emission Point ID Number: 0667-0

Associated Equipment

Associated Emission Unit ID Numbers: 0667-1, 0667-2

Emissions Control Equipment ID Number: 0667-C

Emissions Control Equipment Description: Baghouse

Applicable Requirements

Emission Unit vented through this Emission Point: 0667-1

Emission Unit Description: Coal Mill and Bins

Raw Material/Fuel: Coal

Rated Capacity: 20 TPH

Emission Unit vented through this Emission Point: 0667-2

Emission Unit Description: Coal Mill Air Heater

Raw Material/Fuel: Natural Gas

Rated Capacity: 0.01 MMcf/hr

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 20%⁽¹⁾

Authority for Requirement: Iowa DNR Construction Permit 78-A-232-S3

567 IAC 23.1(2)"v"

40 CFR 60.252(c)

⁽¹⁾ If opacity greater than that observed in the initial performance test is viewed other than startup, shutdown, or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Pollutant: Particulate Matter

Emission Limits: 0.1 gr./scf

Authority for Requirement: Iowa DNR Construction Permit 78-A-232-S3

567 IAC 23.3(2)"a"

Pollutant: PM₁₀

Emission Limits: 5.76 lb./hr

Authority for Requirement: Iowa DNR Construction Permit 78-A-232-S3

Pollutant: Sulfur Dioxide (SO₂)

Emission Limit(s): 500 ppmv

Authority for Requirement: 567 IAC 23.3(3)"e"

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height (feet): 113

Stack Opening (inches): 11 x 14

Stack Exhaust Flow Rate (scfm): 29,000

Stack Temperature (°F): 140

Vertical, Unobstructed Discharge Required: Yes ☒ No ☐

Authority for Requirement: Iowa DNR Construction Permit 78-A-232-S3

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

The facility shall check the opacity weekly during a period when the emission unit on this emission point is at or near full capacity and record the reading. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. Opacity shall be observed to ensure that no visible emissions occur during the material handling operation of the unit. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required. If an opacity (>20 %) is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Authority for Requirement: 567 IAC 22.108(14)

Agency Approved Operation & Maintenance Plan Required? Yes ☒ No ☐

Relevant requirements of O & M plan for this equipment: Particulate Matter- see **Appendix B**.

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 0684-0**Associated Equipment**

Associated Emission Unit ID Numbers: 0684-1

Emissions Control Equipment ID Number: 0684-C

Emissions Control Equipment Description: Baghouse

Applicable Requirements

Emission Unit vented through this Emission Point: 0684-1

Emission Unit Description: Coal Silo

Raw Material/Fuel: Coal

Rated Capacity: 200 TPH

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 20%⁽¹⁾

Authority for Requirement: Iowa DNR Construction Permit 78-A-248-S6

567 IAC 23.1(2)"v"

40 CFR 60.252(c)

⁽¹⁾ If opacity greater than that observed in the initial performance test is viewed other than startup, shutdown, or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Pollutant: Particulate Matter

Emission Limits: 0.1 gr./scf

Authority for Requirement: Iowa DNR Construction Permit 78-A-248-S6

567 IAC 23.3(2)"a"

Pollutant: PM₁₀

Emission Limits: 0.67 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 78-A-248-S6

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height (feet): 142

Stack Opening (inches): 12 x 21

Stack Exhaust Flow Rate (scfm): 4,000

Stack Temperature (°F): 70

Vertical, Unobstructed Discharge Required: Yes ☒ No ☐

Authority for Requirement: Iowa DNR Construction Permit 78-A-248-S6

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

The facility shall check the opacity weekly during a period when the emission unit on this emission point is at or near full capacity and record the reading. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. Opacity shall be observed to ensure that no visible emissions occur during the material handling operation of the unit. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required. If an opacity (>20 %) is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Authority for Requirement: 567 IAC 22.108(14)

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes ☒ No ☐

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six(6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 0690-0-F

Associated Equipment

Associated Emission Unit ID Numbers: 0690-3-F

Applicable Requirements

Emission Unit vented through this Emission Point: 0690-3-F

Emission Unit Description: Hopper/Weigh Feeder

Raw Material/Fuel: Coal

Rated Capacity: 200 tons/hr

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from these emission points shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40%⁽¹⁾

Authority for Requirement: Iowa DNR Construction Permit 96-A-645-S3
567 IAC 23.3(2)"d"

⁽¹⁾ Per DNR Air Quality Policy 3-b-08, Opacity Limits, an exceedence of the indicator opacity of (10%) will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. The permit holder shall also file an "indicator opacity exceedence report" with the DNR field office and keep records as required in the policy. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter

Emission Limits: 0.1 gr./dscf

Authority for Requirement: Iowa DNR Construction Permit 96-A-645-S3
567 IAC 23.3(2)"a"

Pollutant: PM₁₀

Emission Limits: 0.95 lb./hr and 0.52 tons/yr

Authority for Requirement: Iowa DNR Construction Permit 96-A-645-S3

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Process throughput: The transfer of coal associated with this process shall not exceed the rate of 200 tons/hr or 600 tons/day.

Reporting & Record keeping: All records, as required below, shall be satisfactory for demonstrating compliance with all applicable operating limits.

Records shall be maintained on site for five (5) years and be available for inspection upon request by representatives of the Department of Natural Resources. The records shall show the following: A log shall be kept showing the date, the amount of coal (in tons/day) transfer associated with source 0690-4-F on that date, the total hours (in hrs/day) of operation for source 0690-3-F on that date, and the average rate (in tons/hr) of coal transfer for source 0690-3-F for that day.

Authority for Requirement: Iowa DNR Construction Permit 96-A-645-S3

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 0723-0-F

Associated Equipment

Associated Emission Unit ID Numbers: 0723-1-F

Emissions Control Equipment ID Numbers: 0723-C to 0727-C and 1732-C

Emissions Control Equipment Description: Baghouses

Applicable Requirements

Emission Unit vented through this Emission Point: 0723-1-F

Emission Unit Description: Clinker Reclaim Vibrating Feeders

Raw Material/Fuel: Clinker

Rated Capacity: 180 TPH

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 10%⁽¹⁾

Authority for Requirement: Iowa DNR Construction Permit 78-A-236-S4

567 IAC 23.1(4)"bl"

40 CFR 63.1348

⁽¹⁾ If opacity greater than that observed in the initial performance test is viewed other than startup, shutdown, or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Pollutant: Particulate Matter

Emission Limits: 0.1 gr/dscf

Authority for Requirement: Iowa DNR Construction Permit 78-A-236-S4

567 IAC 23.3(2)"a"

Pollutant: PM₁₀

Emission Limits: 0.43 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 78-A-236-S4

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Reporting & Record keeping:

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. The records shall show the following:

Recordkeeping for NESHAP 40 CFR 63 Subpart LLL at the facility shall be done per 40 CFR 63.1355.

Authority for Requirement: Iowa DNR Construction Permit 78-A-236-S4
567 IAC 23.1(4)"bl"
40 CFR 63.1355

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height (feet): Vents inside.

Stack Diameter (inches): Vents inside.

Stack Exhaust Flow Rate (acfm): Vents inside.

Stack Temperature (°F): Vents inside.

Authority for Requirement: Iowa DNR Construction Permit 78-A-236-S4

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

The facility shall check the opacity as described in (a)(4)(i-vii) **of Plant-Wide Conditions-Applicable Limits and Requirements From 40 CFR 63 Subpart LLL-Monitoring Requirements.**

Stack Testing:

Pollutant – Opacity

Stack Test to be Completed by (date) – May 31, 2004

Test Method – 40 CFR 60 Appendix A, Method 9

Authority for Requirement - Iowa DNR Construction Permit 85-A-052-S4

Agency Approved Operation & Maintenance Plan Required? Yes ☒ No ☐

Relevant requirements of O & M plan for this equipment: Particulate Matter and Opacity-
see Appendix B.

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Authority for Requirement: 567 IAC 22.108(3)"b"

IV. General Conditions

This permit is issued under the authority of the Iowa Code subsection 455B.133(8) and in accordance with 567 Iowa Administrative Code chapter 22.

G1. Duty to Comply

1. The permittee must comply with all conditions of the Title V permit. Any permit noncompliance constitutes a violation of the Act and is grounds for enforcement action; for a permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. *567 IAC 22.108(9)"a"*
2. Any compliance schedule shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based. *567 IAC 22.105 (2)"h"(3)*
3. Where an applicable requirement of the Act is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions shall be enforceable by the administrator and are incorporated into this permit. *567 IAC 22.108 (1)"b"*
4. Unless specified as either "state enforceable only" or "local program enforceable only", all terms and conditions in the permit, including provisions to limit a source's potential to emit, are enforceable by the administrator and citizens under the Act. *567 IAC 22.108 (14)*
5. It shall not be a defense for a permittee, in an enforcement action, that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. *567 IAC 22.108 (9)"b"*

G2. Permit Expiration

1. Except as provided in 567 IAC 22.104, the expiration of this permit terminates the permittee's right to operate unless a timely and complete application has been submitted for renewal. Any testing required for renewal shall be completed before the application is submitted. *567 IAC 22.116(2)*
2. To be considered timely, the owner, operator, or designated representative (where applicable) of each source required to obtain a Title V permit shall present or mail the Air Quality Bureau, Iowa Department of Natural Resources, Air Quality Bureau, 7900 Hickman Rd, Suite #1, Urbandale, Iowa 50322, two copies (three if your facility is located in Linn or Polk county) of a complete permit application, at least 6 months but not more than 18 months prior to the date of permit expiration. An additional copy must also be sent to EPA Region VII, Attention: Chief of Air Permits, 901 N. 5th St., Kansas City, KS 66101. The application must include all emission points, emission units, air pollution control equipment, and monitoring devices at the facility. All emissions generating activities, including fugitive emissions, must be included. The definition of a complete application is as indicated in 567 IAC 22.105(2). *567 IAC 22.105*

G3. Certification Requirement for Title V Related Documents

Any application, report, compliance certification or other document submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. All certifications shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. *567 IAC 22.107 (4)*

G4. Annual Compliance Certification

By March 31 of each year, the permittee shall submit compliance certifications for the previous calendar year. The certifications shall include descriptions of means to monitor the compliance status of all emissions sources including emissions limitations, standards, and work practices in accordance with applicable requirements. The certification for a source shall include the identification of each term or condition of the permit that is the basis of the certification; the

compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with all applicable department rules. For sources determined not to be in compliance at the time of compliance certification, a compliance schedule shall be submitted which provides for periodic progress reports, dates for achieving activities, milestones, and an explanation of why any dates were missed and preventive or corrective measures. The compliance certification shall be submitted to the administrator, director, and the appropriate DNR Field office. *567 IAC 22.108 (15)"e"*

G5. Semi-Annual Monitoring Report

By March 31 and September 30 of each year, the permittee shall submit a report of any monitoring required under this permit for the 6 month periods of July 1 to December 31 and January 1 to June 30, respectively. All instances of deviations from permit requirements must be clearly identified in these reports, and the report must be signed by a responsible official, consistent with 567 IAC 22.107(4). The semi-annual monitoring report shall be submitted to the director and the appropriate DNR Field office. *567 IAC 22.108 (5)*

G6. Annual Fee

1. The permittee is required under subrule 567 IAC 22.106 to pay an annual fee based on the total tons of actual emissions of each regulated air pollutant. Beginning July 1, 1996, Title V operating permit fees will be paid on July 1 of each year. The fee shall be based on emissions for the previous calendar year.
2. The fee amount shall be calculated based on the first 4,000 tons of each regulated air pollutant emitted each year. The fee to be charged per ton of pollutant will be available from the department by June 1 of each year. The Responsible Official will be advised of any change in the annual fee per ton of pollutant.
3. The following forms shall be submitted annually by March 31 documenting actual emissions for the previous calendar year.
 - a. Form 1.0 "Facility Identification";
 - b. Form 4.0 "Emissions unit-actual operations and emissions" for each emission unit;
 - c. Form 5.0 "Title V annual emissions summary/fee"; and
 - d. Part 3 "Application certification."
4. The fee shall be submitted annually by July 1. The fee shall be submitted with the following forms:
 - a. Form 1.0 "Facility Identification";
 - b. Form 5.0 "Title V annual emissions summary/fee";
 - c. Part 3 "Application certification."
5. If there are any changes to the emission calculation form, the department shall make revised forms available to the public by January 1. If revised forms are not available by January 1, forms from the previous year may be used and the year of emissions documented changed. The department shall calculate the total statewide Title V emissions for the prior calendar year and make this information available to the public no later than April 30 of each year.
6. Phase I acid rain affected units under section 404 of the Act shall not be required to pay a fee for emissions which occur during the years 1993 through 1999 inclusive.
7. The fee for a portable emissions unit or stationary source which operates both in Iowa and out of state shall be calculated only for emissions from the source while operating in Iowa.
8. Failure to pay the appropriate Title V fee represents cause for revocation of the Title V permit as indicated in 567 IAC 22.115(1)"d".

G7. Inspection of Premises, Records, Equipment, Methods and Discharges

Upon presentation of proper credentials and any other documents as may be required by law, the permittee shall allow the director or the director's authorized representative to:

1. Enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
3. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
4. Sample or monitor, at reasonable times, substances or parameters for the purpose of ensuring compliance with the permit or other applicable requirements. *567 IAC 22.108 (15)"b"*

G8. Duty to Provide Information

The permittee shall furnish to the director, within a reasonable time, any information that the director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the director copies of records required to be kept by the permit, or for information claimed to be confidential, the permittee shall furnish such records directly to the administrator of EPA along with a claim of confidentiality. *567 IAC 22.108 (9)"e"*

G9. General Maintenance and Repair Duties

The owner or operator of any air emission source or control equipment shall:

1. Maintain and operate the equipment or control equipment at all times in a manner consistent with good practice for minimizing emissions.
2. Remedy any cause of excess emissions in an expeditious manner.
3. Minimize the amount and duration of any excess emission to the maximum extent possible during periods of such emissions. These measures may include but not be limited to the use of clean fuels, production cutbacks, or the use of alternate process units or, in the case of utilities, purchase of electrical power until repairs are completed.
4. Schedule, at a minimum, routine maintenance of equipment or control equipment during periods of process shutdowns to the maximum extent possible. *567 IAC 24.2(1)*

G10. Recordkeeping Requirements for Compliance Monitoring

1. In addition to any source specific recordkeeping requirements contained in this permit, the permittee shall maintain the following compliance monitoring records, where applicable:
 - a. The date, place and time of sampling or measurements
 - b. The date the analyses were performed.
 - c. The company or entity that performed the analyses.
 - d. The analytical techniques or methods used.
 - e. The results of such analyses; and
 - f. The operating conditions as existing at the time of sampling or measurement.
 - g. The records of quality assurance for continuous compliance monitoring systems (including but not limited to quality control activities, audits and calibration drifts.)
2. The permittee shall retain records of all required compliance monitoring data and support information for a period of at least 5 years from the date of compliance monitoring sample, measurement report or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous compliance monitoring, and copies of all reports required by the permit.
3. For any source which in its application identified reasonably anticipated alternative operating scenarios, the permittee shall:

- a. Comply with all terms and conditions of this permit specific to each alternative scenario.
- b. Maintain a log at the permitted facility of the scenario under which it is operating.
- c. Consider the permit shield, if provided in this permit, to extend to all terms and conditions under each operating scenario. 567 IAC 22.108(4), 567 IAC 22.108(12)

G11. Evidence used in establishing that a violation has or is occurring.

Notwithstanding any other provisions of these rules, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions herein.

1. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred at a source:

a. *A monitoring method approved for the source and incorporated in an operating permit pursuant to 567 Chapter 22;*

b. Compliance test methods specified in 567 Chapter 25; or

c. Testing or monitoring methods approved for the source in a construction permit issued pursuant to 567 Chapter 22.

2. The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:

a. Any monitoring or testing methods provided in these rules; or

b. *Other testing, monitoring, or information gathering methods that produce information comparable to that produced by any method in subrule 21.5(1) or this subrule. 567 IAC 21.5(1)-567 IAC 21.5(2)*

G12. Prevention of Accidental Release: Risk Management Plan Notification and Compliance Certification

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Act, the permittee shall notify the department of this requirement. The plan shall be filed with all appropriate authorities by the deadline specified by EPA. A certification that this risk management plan is being properly implemented shall be included in the annual compliance certification of this permit. 567 IAC 22.108(6)

G13. Hazardous Release

The permittee must report any situation involving the actual, imminent, or probable release of a hazardous substance into the atmosphere which, because of the quantity, strength and toxicity of the substance, creates an immediate or potential danger to the public health, safety or to the environment. A verbal report shall be made to the department at (515) 281-8694 and to the local police department or the office of the sheriff of the affected county as soon as possible but not later than six hours after the discovery or onset of the condition. This verbal report must be followed up with a written report as indicated in 567 IAC 131.2(2). 567 IAC Chapter 131-State Only

G14. Excess Emissions and Excess Emissions Reporting Requirements

1. Excess Emissions. Excess emission during a period of startup, shutdown, or cleaning of control equipment is not a violation of the emission standard if the startup, shutdown or cleaning is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions. Cleaning of control equipment which does not require the shutdown of the process equipment shall be limited to one six-minute period per one-hour period. An incident of excess emission (other than an incident during startup, shutdown or cleaning of control equipment) is a violation. If the owner or operator of a source maintains that the incident of excess emission was due to a malfunction, the owner or operator must show that the conditions which caused the incident of excess emission were not preventable by reasonable maintenance and control measures.

Determination of any subsequent enforcement action will be made following review of this report.

If excess emissions are occurring, either the control equipment causing the excess emission shall be

repaired in an expeditious manner or the process generating the emissions shall be shutdown within a reasonable period of time. An expeditious manner is the time necessary to determine the cause of the excess emissions and to correct it within a reasonable period of time. A reasonable period of time is eight hours plus the period of time required to shut down the process without damaging the process equipment or control equipment. In the case of an electric utility, a reasonable period of time is eight hours plus the period of time until comparable generating capacity is available to meet consumer demand with the affected unit out of service, unless, the director shall, upon investigation, reasonably determine that continued operation constitutes an unjustifiable environmental hazard and issue an order that such operation is not in the public interest and require a process shutdown to commence immediately.

2. Excess Emissions Reporting

a. Oral Reporting of Excess Emissions. An incident of excess emission (other than an incident of excess emission during a period of startup, shutdown, or cleaning) shall be reported to the appropriate field office of the department within eight hours of, or at the start of the first working day following the onset of the incident. The reporting exemption for an incident of excess emission during startup, shutdown or cleaning does not relieve the owner or operator of a source with continuous monitoring equipment of the obligation of submitting reports required in 567-subrule 25.1(6). An oral report of excess emission is not required for a source with operational continuous monitoring equipment (as specified in 567-subrule 25.1(1)) if the incident of excess emission continues for less than 30 minutes and does not exceed the applicable visible emission standard by more than 10 percent opacity. The oral report may be made in person or by telephone and shall include as a minimum the following:

- i. The identity of the equipment or source operation from which the excess emission originated and the associated stack or emission point.
- ii. The estimated quantity of the excess emission.
- iii. The time and expected duration of the excess emission.
- iv. The cause of the excess emission.
- v. The steps being taken to remedy the excess emission.
- vi. The steps being taken to limit the excess emission in the interim period.

b. Written Reporting of Excess Emissions. A written report of an incident of excess emission shall be submitted as a follow-up to all required oral reports to the department within seven days of the onset of the upset condition, and shall include as a minimum the following:

- i. The identity of the equipment or source operation point from which the excess emission originated and the associated stack or emission point.
- ii. The estimated quantity of the excess emission.
- iii. The time and duration of the excess emission.
- iv. The cause of the excess emission.

v. The steps that were taken to remedy and to prevent the recurrence of the incident of excess emission.

vi. The steps that were taken to limit the excess emission.

vii. If the owner claims that the excess emission was due to malfunction, documentation to support this claim. *567 IAC 24.1(1)-567 IAC 24.1(4)*

3. Emergency Defense for Excess Emissions. For the purposes of this permit, an “emergency” means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit due to unavoidable increases in emissions attributable to the emergency. An emergency shall

not include non-compliance, to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation or operator error. An emergency constitutes an affirmative defense to an action brought for non-compliance with technology based limitations if it can be demonstrated through properly signed contemporaneous operating logs or other relevant evidence that:

- a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
- b. The facility at the time was being properly operated;
- c. During the period of the emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements of the permit; and
- d. The permittee submitted notice of the emergency to the director by certified mail within two working days of the time when the emissions limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. *567 IAC 22.108(16)*

G15. Permit Deviation Reporting Requirements

A deviation is any failure to meet a term, condition or applicable requirement in the permit. Reporting requirements for deviations that result in a hazardous release or excess emissions have been indicated above (see G13 and G14). Unless more frequent deviation reporting is specified in the permit, any other deviation shall be documented in the semi-annual monitoring report and the annual compliance certification (see G4 and G5). *567 IAC 22.108(5)"b"*

G16. Notification Requirements for Sources That Become Subject to NSPS and NESHAP Regulations

During the term of this permit, the permittee must notify the department of any source that becomes subject to a standard or other requirement under 567-subrule 23.1(2) (standards of performance of new stationary sources) or section 111 of the Act; or 567-subrule 23.1(3) (emissions standards for hazardous air pollutants), 567-subrule 23.1(4) (emission standards for hazardous air pollutants for source categories) or section 112 of the Act. This notification shall be submitted in writing to the department pursuant to the notification requirements in 40 CFR Section 60.7, 40 CFR Section 61.07, and/or 40 CFR Section 63.9. *567 IAC 23.1(2), 567 IAC 23.1(3), 567 IAC 23.1(4)*

G17. Requirements for Making Changes to Emission Sources That Do Not Require Title V Permit Modification

1. Off Permit Changes to a Source. Pursuant to section 502(b)(10) of the CAAA, the permittee may make changes to this installation/facility without revising this permit if:
 - a. The changes are not major modifications under any provision of any program required by section 110 of the Act, modifications under section 111 of the act, modifications under section 112 of the act, or major modifications as defined in 567 IAC Chapter 22.
 - b. The changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions);
 - c. The changes are not modifications under any provisions of Title I of the Act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or as total emissions);
 - d. The changes are not subject to any requirement under Title IV of the Act.
 - e. The changes comply with all applicable requirements.
 - f. For such a change, the permitted source provides to the department and the administrator by certified mail, at least 30 days in advance of the proposed change, a written notification, including the following, which must be attached to the permit by the source, the department and the administrator:

- i. A brief description of the change within the permitted facility,
- ii. The date on which the change will occur,
- iii. Any change in emission as a result of that change,
- iv. The pollutants emitted subject to the emissions trade
- v. If the emissions trading provisions of the state implementation plan are invoked, then Title V permit requirements with which the source shall comply; a description of how the emissions increases and decreases will comply with the terms and conditions of the Title V permit.
- vi. A description of the trading of emissions increases and decreases for the purpose of complying with a federally enforceable emissions cap as specified in and in compliance with the Title V permit; and
- vii. Any permit term or condition no longer applicable as a result of the change.

567 IAC 22.110(1)

2. Such changes do not include changes that would violate applicable requirements or contravene federally enforceable permit terms and conditions that are monitoring (including test methods), record keeping, reporting, or compliance certification requirements. *567 IAC 22.110(2)*

3. Notwithstanding any other part of this rule, the director may, upon review of a notice, require a stationary source to apply for a Title V permit if the change does not meet the requirements of subrule 22.110(1). *567 IAC 22.110(3)*

4. The permit shield provided in subrule 22.108(18) shall not apply to any change made pursuant to this rule. Compliance with the permit requirements that the source will meet using the emissions trade shall be determined according to requirements of the state implementation plan authorizing the emissions trade. *567 IAC 22.110(4)*

5. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes, for changes that are provided for in this permit. *567 IAC 22.108(11)*

G18. Duty to Modify a Title V Permit

1. Administrative Amendment.

a. An administrative permit amendment is a permit revision that is required to do any of the following:

- i. Correct typographical errors
- ii. Identify a change in the name, address, or telephone number of any person identified in the permit, or provides a similar minor administrative change at the source;
- iii. Require more frequent monitoring or reporting by the permittee; or
- iv. Allow for a change in ownership or operational control of a source where the director determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new permittee has been submitted to the director.

b. The permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. The request shall be submitted to the director.

c. Administrative amendments to portions of permits containing provisions pursuant to Title IV of the Act shall be governed by regulations promulgated by the administrator under Title IV of the Act.

2. Minor Permit Modification.

a. Minor permit modification procedures may be used only for those permit modifications that do any of the following:

- i. Do not violate any applicable requirements
 - ii. Do not involve significant changes to existing monitoring, reporting or recordkeeping requirements in the Title V permit.
 - iii. Do not require or change a case by case determination of an emission limitation or other standard, or increment analysis.
 - iv. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed in order to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include any federally enforceable emissions caps which the source would assume to avoid classification as a modification under any provision under Title I of the Act; and an alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Act.;
 - v. Are not modifications under any provision of Title I of the Act; and
 - vi. Are not required to be processed as significant modification.
- b. An application for minor permit revision shall be on the minor Title V modification application form and shall include at least the following:
- i. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs.
 - ii. The permittee's suggested draft permit
 - iii. Certification by a responsible official, pursuant to 567 IAC 22.107(4), that the proposed modification meets the criteria for use of a minor permit modification procedures and a request that such procedures be used; and
 - iv. Completed forms to enable the department to notify the administrator and the affected states as required by 567 IAC 22.107(7).
- c. The permittee may make the change proposed in its minor permit modification application immediately after it files the application. After the permittee makes this change and until the director takes any of the actions specified in 567 IAC 22.112(4) "a" to "c", the permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this time, the permittee need not comply with the existing permit terms and conditions it seeks to modify. However, if the permittee fails to comply with its proposed permit terms and conditions during this time period, existing permit term terms and conditions it seeks to modify may subject the facility to enforcement action.

3. Significant Permit Modification. Significant Title V modification procedures shall be used for applications requesting Title V permit modifications that do not qualify as minor Title V modifications or as administrative amendments. These include but are not limited to all significant changes in monitoring permit terms, every relaxation of reporting or recordkeeping permit terms, and any change in the method of measuring compliance with existing requirements. Significant Title V modifications shall meet all requirements of 567 IAC Chapter 22, including those for applications, public participation, review by affected states, and review by the administrator, and those requirements that apply to Title V issuance and renewal. *567 IAC 22.111-567 IAC 22.113* The permittee shall submit an application for a significant permit modification not later than three months after commencing operation of the changed source unless the existing Title V permit would prohibit such construction or change in operation, in which event the operation of the changed source may not commence until the department revises the permit. *567 IAC 22.105(1)"a"(4)*

G19. Duty to Obtain Construction Permits

Unless exempted under 567 IAC 22.1(2), the permittee must not construct, install, reconstruct, or alter any equipment, control equipment or anaerobic lagoon without first obtaining a construction permit, conditional permit, or permit pursuant to 567 IAC 22.8, or permits required pursuant to 567 IAC 22.4 and 567 IAC 22.5. Such permits shall be obtained prior to the initiation of construction, installation or alteration of any portion of the stationary source. *567 IAC 22.1(1)*

G20. Asbestos

The permittee shall comply with 567 IAC 23.1(3)"a", and 567 IAC 23.2(3)"g" when conducting any renovation or demolition activities at the facility. *567 IAC 23.1(3)"a", and 567 IAC 23.2*

G21. Open Burning

The permittee is prohibited from conducting open burning, except as may be allowed by 567 IAC 23.2. *567 IAC 23.2 except 23.2(3)"h"; 567 IAC 23.2(3)"h" - State Only*

G22. Acid Rain (Title IV) Emissions Allowances

The permittee shall not exceed any allowances that it holds under Title IV of the Act or the regulations promulgated there under. Annual emissions of sulfur dioxide in excess of the number of allowances to emit sulfur dioxide held by the owners and operators of the unit or the designated representative of the owners and operators is prohibited. Exceedences of applicable emission rates are prohibited. "Held" in this context refers to both those allowances assigned to the owners and operators by USEPA, and those allowances supplementally acquired by the owners and operators. The use of any allowance prior to the year for which it was allocated is prohibited. Contravention of any other provision of the permit is prohibited. *567 IAC 22.108(7)*

G23. Stratospheric Ozone and Climate Protection (Title VI) Requirements

1. The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:

a. All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to § 82.106.

b. The placement of the required warning statement must comply with the requirements pursuant to § 82.108.

c. The form of the label bearing the required warning statement must comply with the requirements pursuant to § 82.110.

d. No person may modify, remove, or interfere with the required warning statement except as described in § 82.112.

2. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:

a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156.

b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to § 82.158.

c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161.

d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with reporting and recordkeeping requirements pursuant to § 82.166. ("MVAC-like appliance" as defined at § 82.152)

e. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to § 82.156.

f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.

3. If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.

4. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant,

5. The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *40 CFR part 82*

G24. Permit Reopenings

1. This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. *567 IAC 22.108(9)"c"*

2. Additional applicable requirements under the Act become applicable to a major part 70 source with a remaining permit term of 3 or more years. Revisions shall be made as expeditiously as practicable, but not later than 18 months after the promulgation of such standards and regulations.

a. Reopening and revision on this ground is not required if the permit has a remaining term of less than three years;

b. Reopening and revision on this ground is not required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to 40 CFR 70.4(b)(10)(i) or (ii) as amended to June 25, 1993.

c. Reopening and revision on this ground is not required if the additional applicable requirements are implemented in a general permit that is applicable to the source and the source receives approval for coverage under that general permit. *567 IAC 22.108(17)"a", 567 IAC 22.108(17)"b"*

3. A permit shall be reopened and revised under any of the following circumstances:

a. The department receives notice that the administrator has granted a petition for disapproval of a permit pursuant to 40 CFR 70.8(d) as amended to June 25, 1993, provided that the reopening may be stayed pending judicial review of that determination;

b. The department or the administrator determines that the Title V permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Title V permit;

c. Additional applicable requirements under the Act become applicable to a Title V source, provided that the reopening on this ground is not required if the permit has a remaining term of less than three years, the effective date of the requirement is later than the date on which the permit is due to expire, or the additional applicable requirements are implemented in a general permit that is applicable to the source and the source receives approval for coverage under that general permit. Such a reopening shall be complete not later than 18 months after promulgation of the applicable requirement.

d. Additional requirements, including excess emissions requirements, become applicable to a Title IV affected source under the acid rain program. Upon approval by the administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

e. The department or the administrator determines that the permit must be revised or revoked to ensure compliance by the source with the applicable requirements. *567 IAC 22.114(1)*

4. Proceedings to reopen and reissue a Title V permit shall follow the procedures applicable to initial permit issuance and shall effect only those parts of the permit for which cause to reopen exists. *567 IAC 22.114(2)*

G25. Permit Shield

1. The director may expressly include in a Title V permit a provision stating that compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:

a. Such applicable requirements are included and are specifically identified in the permit; or
b. The director, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.

2. A Title V permit that does not expressly state that a permit shield exists shall be presumed not to provide such a shield.

3. A permit shield shall not alter or affect the following:

a. The provisions of Section 303 of the Act (emergency orders), including the authority of the administrator under that section;
b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the Act;
d. The ability of the department or the administrator to obtain information from the facility pursuant to Section 114 of the Act. *567 IAC 22.108 (18)*

G26. Severability

The provisions of this permit are severable and if any provision or application of any provision is found to be invalid by this department or a court of law, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected by such finding. *567 IAC 22.108 (8)*

G27. Property Rights

The permit does not convey any property rights of any sort, or any exclusive privilege. *567 IAC 22.108 (9)"d"*

G28. Transferability

This permit is not transferable from one source to another. If title to the facility or any part of it is transferred, an administrative amendment to the permit must be sought to determine transferability of the permit. *567 IAC 22.111 (1)"d"*

G29. Disclaimer

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. *567 IAC 22.3(3)"c"*

G30. Notification and Reporting Requirements for Stack Tests or Monitor Certification

The permittee shall notify the department's stack test contact in writing not less than 30 days before a required test or performance evaluation of a continuous emission monitor is performed to determine compliance with an applicable requirement. For the department to consider test results a valid demonstration of compliance with applicable rules or a permit condition, such notice shall be

given. Such notice shall include the time, the place, the name of the person who will conduct the test and other information as required by the department. Unless specifically waived by the department's stack test contact, a pretest meeting shall be held not later than 15 days prior to conducting the compliance demonstration. The department may accept a testing protocol in lieu of a pretest meeting. A representative of the department shall be permitted to witness the tests. Results of the tests shall be submitted in writing to the department's stack test contact in the form of a comprehensive report within six weeks of the completion of the testing. Compliance tests conducted pursuant to this permit shall be conducted with the source operating in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which the source shall be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the equipment manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the department that the source has been physically altered so that capacity cannot be exceeded, or the department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the department to determine whether such source is in compliance.

Stack test notifications, reports and correspondence shall be sent to:

Stack Test Review Coordinator
Iowa DNR, Air Quality Bureau
7900 Hickman Road, Suite #1
Urbandale, IA 50322
(515) 242-6001

Within Polk and Linn Counties, stack test notifications, reports and correspondence shall also be directed to the supervisor of the respective county air pollution program.

567 IAC 25.1(7)"a", 567 IAC 25.1(9)

G31. Prevention of Air Pollution Emergency Episodes

The permittee shall comply with the provisions of 567 IAC Chapter 26 in the prevention of excessive build-up of air contaminants during air pollution episodes, thereby preventing the occurrence of an emergency due to the effects of these contaminants on the health of persons. *567 IAC 26.1(1)*

G32. Contacts List

The current address and phone number for reports and notifications to the EPA administrator is:

Chief of Air Permits
EPA Region 7
Air Permits and Compliance Branch
901 N. 5th Street
Kansas City, KS 66101
(913) 551-7020

The current address and phone number for reports and notifications to the department or the Director is:

Chief, Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite #1
Urbandale, IA 50322
(515) 242-5100

Reports or notifications to the DNR Field Offices or local programs shall be directed to the supervisor at the appropriate field office or local program. Current addresses and phone numbers are:

Field Office 1

909 West Main – Suite 4
Manchester, IA 52057
(563) 927-2640

Field Office 2

P.O. Box 1443
2300-15th St., SW
Mason City, IA 50401
(641) 424-4073

Field Office 3

1900 N. Grand Ave.
Spencer, IA 51301
(712) 262-4177

Field Office 4

1401 Sunnyside Lane
Atlantic, IA 50022
(712) 243-1934

Field Office 5

401 SW 7th Street, Suite I
Des Moines, IA 50309
(515) 725-0268

Field Office 6

1023 West Madison Street
Washington, IA 52353-1623
(319) 653-2135

Polk County Planning & Development

Air Quality Division
5885 NE 14th St.
Des Moines, IA 50313
(515) 286-3351

Linn County Public Health Dept.

Air Pollution Control Division
501 13th St., NW
Cedar Rapids, IA 52405
(319) 892-6000

Appendix A: Administrative Consent Order # 98-AQ-08

**IOWA DEPARTMENT OF NATURAL RESOURCES
ADMINISTRATIVE CONSENT ORDER**

IN THE MATTER OF:	ADMINISTRATIVE CONSENT ORDER
LAFARGE CORPORATION	NO. 98-AQ-08

TO: LAFARGE CORPORATION
Cement Group/Davenport Plant
Heinz Knopfel
Process and Environmental Manager
P.O. Box 4049
Davenport, Iowa 52808

LAFARGE CORPORATION
c/o Prentice Hall Corporation System, Registered Agent
729 Insurance Exchange Building
Des Moines, Iowa 50309

I. SUMMARY

This Administrative Consent Order is entered into between the Iowa Department of Natural Resources (DNR) and Lafarge Corporation (Lafarge) for the purpose of resolving PM-10 National Ambient Air Quality Violations monitored in Buffalo, Iowa. This consent order supersedes Administrative Consent Order 97-AQ-09 and any conflicting terms of Administrative Consent Order 97-AQ-09 shall terminate upon the signature of this administrative consent order by the director of the DNR.

Any questions regarding this order should be directed to:

Relating to technical requirements:

Doug Campbell
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Des Moines, Iowa 50322
Ph: 515/281-8930

Relating to appeal rights:

Anne Preziosi
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Des Moines, Iowa 50322
Ph: 515/281-6243

II. STATEMENT OF FACTS

1. DNR has monitored three exceedences of the 24-hour PM-10 National Ambient Air Quality Standard. On October 15, 1995, a DNR monitoring site located at

**IOWA DEPARTMENT OF NATURAL RESOURCES
ADMINISTRATIVE CONSENT ORDER
ISSUED TO: Lafarge Corporation**

11100-110th Avenue in Buffalo, Iowa, recorded a PM-10 concentration of 156.5 micrograms per cubic meter (ug/m^3), and on August 25, 1995, the same monitor recorded a value of 162.7 ug/m^3 . On April 26, 1994, a monitored value of 229 ug/m^3 also was recorded at this site. Per 40 C.F.R. Part 50, Appendix K, the number of expected exceedences was calculated to be 4.8 for the three calendar year period from 1993 through 1995.

2. During the period 1993 through 1995, the annual PM-10 National Ambient Air Quality Standard was exceeded. The monitored annual arithmetic mean for 1993 was 46.7 ug/m^3 , for 1994 was 60.5 ug/m^3 , and for 1995 was 67.1 ug/m^3 , for a three year average of 58.1 ug/m^3 .

3. Lafarge is a cement manufacturer located in Buffalo, Iowa. At DNR's request, Lafarge has provided modeling to DNR. This modeling has established that Lafarge is a contributor to the PM-10 levels monitored.

4. The DNR and Lafarge have cooperated in an effort to reach a resolution in order to avoid having to redesignate the area to be in nonattainment for PM-10. For that purpose, DNR and Lafarge have agreed to enter into this Administrative Consent Order.

Lafarge has already completed the following projects as part of the agreement with DNR, of which this Administrative Consent Order is a part:

- 1) Lafarge has erected a 6-foot high chain-link fence along the shoreline of the their property, completing the entire fencing in of the plant property. The fencing is located as designated on Exhibit "A," which is by this reference made a part of this consent order. This construction was required by air quality permit number 96-A-645S1.
- 2) Lafarge has relocated the discharges for five dust collectors from horizontal to vertical discharges, two feet above the applicable building structures. These stack reconfigurations were included in the revised air dispersion modeling analysis. The table below lists the stacks that have been reconfigured.

Emission Point Number	Source Description	IDNR Permit Number
S0420	Vent Conveying System from Raw Mill	78-A-228S2
S0817	Finish Mill #1 System	78-A-237S2
S0822	Finish Mill Separator #1 System	78-A-238S2
S0684	Belt Conveyor 694 to Coal Silo	78-A-248S4
S0811	Finish Product Holding Bin	80-A-013S1

**IOWA DEPARTMENT OF NATURAL RESOURCES
ADMINISTRATIVE CONSENT ORDER
ISSUED TO: Lafarge Corporation**

- 3) Lafarge has purchased and is currently using a new 8000-gallon watering truck for the control of dust along the haul roads throughout the facility. This new truck has the capability of spraying water or chemical dust suppressant to control the dust generated from traffic.
- 4) Amended air quality permits 76-A-005S1 and 78-A-242S1 were issued on December 22, 1997, authorizing reconstruction of part of the Lafarge Overtrack Silo Distribution system. This reconstruction will include the replacement of two dust collectors, S1043 and S1053. The revised PM-10 emission rate and stack parameter changes for these two sources have been incorporated in the revised air dispersion modeling. The amended permits require reconstruction to begin within 18 months of the date of permit issuance and be completed within 36 months after permit issuance.

III. CONCLUSIONS OF LAW

1. This order is issued pursuant to the provisions of Iowa Code sections 455B.134(9) and 455B.138(1), which authorize the Director to issue any administrative orders necessary to secure compliance with or prevent a violation of Iowa Code chapter 455B, Division II, and the rules promulgated and permits issued pursuant thereto, and to prevent, abate, and control air pollution.
2. The emission units and fugitive emissions located at Lafarge in Buffalo, Iowa, are "air contaminant sources" as defined by Iowa Code section 455B.131(2) and "stationary sources" as defined by 567 Iowa Administrative Code (I.A.C.) 20.2.
3. According to 567 I.A.C. 28.1, the ambient air quality standards for the State of Iowa shall be the National Primary and Secondary Ambient Air Quality Standards (NAAQS) located at 40 C.F.R. Part 50, as amended through July 1, 1987.
4. The primary and secondary 24-hour ambient air quality standard for PM-10 is 150 ug/m³, 24-hour average concentration. The standards are attained when the expected number of days per calendar year with a 24-hour average concentration above 150 ug/m³, as determined in accordance with 40 C.F.R. Part 50, Appendix K, is equal to or less than one. The concentrations monitored in this case and the resulting number of exceedences constitute a violation of this standard.
5. The level of the primary and secondary annual standards for PM-10 is 50 ug/m³, annual arithmetic mean averaged over a three calendar year period. The standards are attained when the expected annual arithmetic mean concentration, as determined in accordance with 40 C.F.R. Part 50, Appendix K, is less than or equal to 50 ug/m³. The average of the annual arithmetic means for the period 1993 through 1995 exceeds this standard.

**IOWA DEPARTMENT OF NATURAL RESOURCES
ADMINISTRATIVE CONSENT ORDER
ISSUED TO: Lafarge Corporation**

6. An exceedence of the NAAQS for PM-10 constitutes "air pollution" as defined by Iowa Code section 455B.131(3).

7. In accordance with the provisions of Iowa Code section 455B.134(9), the Director shall issue orders consistent with the rules to cause the abatement or control of air pollution.

8. According to the provisions of 567 I.A.C. 22.1(1) and 567 I.A.C. 22.1(3), the owner or operator of a stationary source shall obtain a permit to install or alter equipment or control equipment. Any modifications occurring as a result of this consent order and subject to the provisions of 567 I.A.C. chapter 22 shall require a construction permit or shall meet the requirements of a construction permit exemption contained in the provisions of 567 I.A.C. 22.1(2).

9. According to the provisions of 567 I.A.C. 23.2(2)"c"(1), no person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, with the exception of farming operations or dust generated by ordinary travel on unpaved public roads, without taking reasonable precautions to prevent particulate matter in quantities sufficient to create a nuisance, as defined in Iowa Code section 657.1, from becoming airborne. All persons, with the above exceptions, shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate. "Reasonable precautions" are defined in this rule.

IV. ORDER

THEREFORE, DNR orders and LAFARGE AGREES to the following:

1. Control of dust on frequently traveled paved and unpaved roads within the facility and quarry shall be performed in accordance with Plan A, Plan C, or Plan D, as specified in Exhibit "B," which is by this reference made a part of this consent order. For purposes of Plans A and D contained in Exhibit "B", an operating day is a 24-hour period beginning with 6 am. Lafarge may change the definition of operating day for the purposes of this consent order by submitting advance notice of the change to DNR in writing. Sweeping or watering need not occur when a rain gauge located at the site indicates that at least 0.2 inch per day of precipitation (water equivalent) has occurred. Lafarge shall conduct its fugitive dust maintenance program according to the specifications in Exhibit "B" which is hereby recognized as providing a 95 percent control efficiency. Lafarge shall maintain daily written records of the amount and type of precipitation, the specific times during which water or suppressant is applied, the amount of water or suppressant applied, and the areas of application. The records shall be

**IOWA DEPARTMENT OF NATURAL RESOURCES
ADMINISTRATIVE CONSENT ORDER
ISSUED TO: Lafarge Corporation**

retained for a period of two years following the date of such measurements and applications and shall be made available to the DNR upon request. Record keeping shall commence no later than April 1, 1998, or within 30 days of entering into this administrative consent order, whichever last occurs.

2. For purposes of the annual average emission rate for PM-10, Lafarge shall follow the "Monthly Limits" listed in Exhibit "C," which is by this reference made a part of this consent order. The applicable parameters specified in Exhibit "C" shall be entered in a monthly log to demonstrate compliance with the monthly limits list. Monthly logs shall be retained for a period of two years following the date of such entries and shall be made available to the Department upon request. Record keeping shall commence no later than April 1, 1998, or within 30 days of entering into this administrative consent order, whichever last occurs.

3. The fuel load in/out (SO 690-3-F) shall be limited to a maximum of 200 tons per hour and 600 tons during any 24-hour period. The calculated PM-10 hourly and annual fugitive emission rates shall be limited to 0.95 lbs/hr and 0.52 tons/yr, respectively. A permit amendment application shall be submitted to the DNR by April 1, 1998, or within 30 days of entering into this administrative consent order, whichever last occurs, requesting that air quality permit number 96-A-645S1 be amended as necessary to include the above operating capacity and emissions limitations. Record keeping requirements shall be as specified in the amended air quality permit.

4. Cement Kiln Dust (CKD) shall no longer be placed in the current location adjacent to Highway 22. The placement area adjacent to Highway 22 shall be capped in accordance with plans approved by the Land Quality Bureau of DNR. Both of these actions shall be completed by December 30, 1998, or within 60 days after receipt of approval from DNR, whichever last occurs. This site shall comply with all applicable DNR regulations. The CKD management plan is part of a Solid Waste Disposal permit application currently being reviewed by the Land Quality Bureau of DNR.

5. Reconstruction of the CKD conditioning system shall commence within 12 months of the issuance date of air quality construction permit number 97-A-789 and shall be completed within 18 months of the start of construction date. (Note: Permit number 97-A-789 was issued on December 22, 1997.) As indicated in the construction permit application, the open stockpile (140-1-F), open CKD transfers (140-2-F), alkali bypass fugitives (550-1-F), waste dust bin collector (564-1), and the nodulizer CKD loadout fugitives, dust collector, and dust collector fugitives (580-1-F, 802-1, 802-1-F) shall be removed from the facility. These emission points shall be removed from the facility within 60 days after completion of the CKD reconstruction. Lafarge shall notify the Department in writing that the above emission sources have been removed from the facility within 90 days of completion of the CKD reconstruction.

**IOWA DEPARTMENT OF NATURAL RESOURCES
ADMINISTRATIVE CONSENT ORDER
ISSUED TO: Lafarge Corporation**

6. By no later than May 1, 1998, Lafarge shall submit to DNR permit applications which include the emission rates listed in Exhibit "D". Exhibit "D" is by this reference made a part of this consent order. Additionally, the permit applications shall include the stack parameters used in the revised air dispersion modeling analysis being submitted to the EPA with this administrative consent order.

7. Lafarge shall continue to comply with all paragraphs of Iowa DOT Agreement No. 94-16-069. A copy of this agreement is provided in Exhibit "E" of this Consent Order. Exhibit "E" shall by this reference become a part of this Consent Order.

8. Lafarge shall submit to the Washington DNR Field Office written quarterly reports detailing progress toward the completion of the requirements of this Consent Order, including compliance with the requirements of all air quality construction permits issued as a result of this Consent Order. The quarterly reports shall be due no later than 30 days following the close of each quarter. The first report shall be due on April 30, 1998.

V. NO ADMISSION

While Lafarge agrees to comply with the orders contained herein, it makes no admission as to the Findings of Facts and Conclusions of Law.

VI. WAIVER OF APPEAL RIGHTS

This order is entered into knowingly and with the consent of Lafarge. For that reason, Lafarge waives its right to appeal this order or any part thereof.

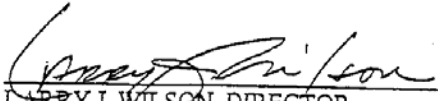
VII. NONCOMPLIANCE

Failure to comply with this order may result in the imposition of administrative penalties or referral to the Attorney General's office to obtain injunctive relief and civil penalties pursuant to the provisions of Iowa Code section 455B.146.

VIII. TERMINATION OF THIS ADMINISTRATIVE CONSENT ORDER

This Consent Order may terminate upon a showing by Lafarge, acceptable to DNR, that it has complied with the obligations contained herein.

IOWA DEPARTMENT OF NATURAL RESOURCES
ADMINISTRATIVE CONSENT ORDER
ISSUED TO: Lafarge Corporation

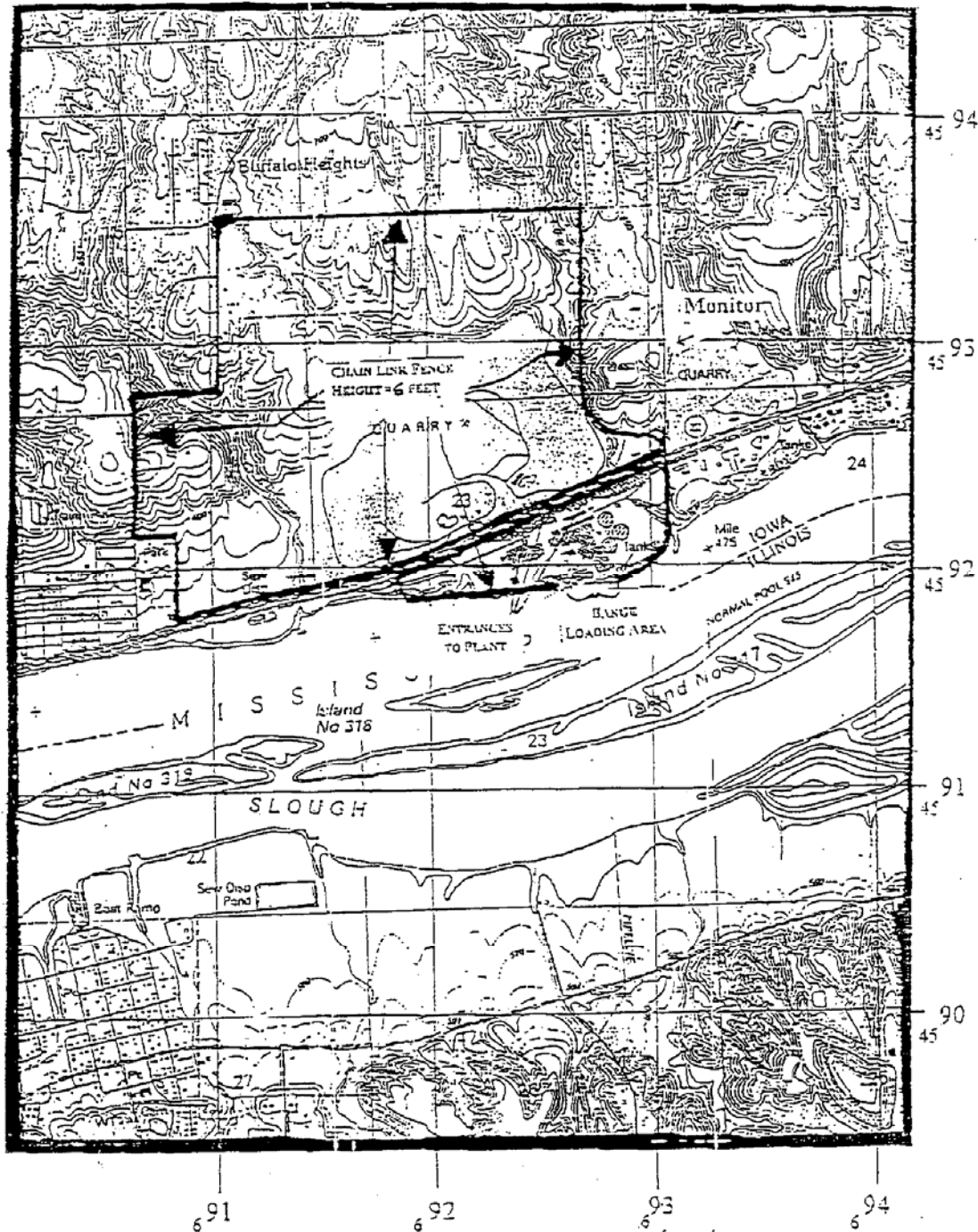

LARRY J. WILSON, DIRECTOR
IOWA DEPARTMENT OF NATURAL RESOURCES

Dated this 19 day of
March, 1998.


for LAFARGE CORPORATION

Dated this 13 day of
MARCH, 1998.

Figure 8-1. Area map - Lafarge Corporation, Buffalo, Iowa.



Edge markings in UTM coordinates.

Exhibit "A"

Exhibit "B"

4.2 Lafarge Corporation Haul Road Fugitive Dust Plan

Lafarge has the following identifiable fugitive road dust sources.

Table 4-3. Identifiable fugitive road dust sources.

Emission Unit	Paved/Unpaved	Type	Description
0155-1-F	U	Truck	Rock hauled from quarry to crusher
0160-1-F	U 95	Truck	Clay hauled from quarry to crusher/storage
0165-1-F	U	Loader	Clay loaded into crusher building hopper
0691-1-F	P	Truck	Unloading of raw material from railcar
0692-1-F	P 95	Truck	Unloading of clinker from railcar
0695-1-F	P	Truck	Unloading of fuel from railcar
0765-1-F	U 95	Loader	Raw materials from storage hall to 0765 feeder - Unpaved
0765-2-F	P 95	Loader	Raw materials from storage hall to 0765 feeder - Paved
1301-1-F	P	Truck	Hauling cement offsite by truck

Lafarge will utilize one of the following methodologies to achieve a 95 percent control efficiency for fugitive dust from unpaved roads unless otherwise agreed upon with the IDNR:

Unpaved Roads

Plan A: Watering

Plan C: Chemical Dust Suppressant

Paved Roads

Plan A: Water flushing followed by sweeping

Plan D: High Pressure Washing

4.2.1 Quarry Roads

Unpaved Roads 155, 160, and 165: Plan A - Watering

The control efficiency of unpaved road watering depends on the:

- Amount of water applied
- Time between re-applications
- Traffic volume
- Meteorological conditions

Exhibit "B"

Page 1 of 9

An empirical model for the performance of water as a control technique has been developed.¹ The model is as follows:

$$C = 100 - \left(\frac{0.8 p d t}{i} \right)$$

where:

C = average control efficiency, %
 p = potential average hourly daytime evaporation rate, mm/h
 d = average hourly daytime traffic rate (hr⁻¹)
 i = application intensity, L/m²
 t = time since last application, hours

$$p = 0.0049(40, \text{ Southeast Iowa}) = \frac{0.196 \text{ mm}}{\text{hr}}$$

Calculations:

Quarry sources include: 155, 160, and 165

The vehicle traffic for 155 and 160 combined based on monthly (730 hours) production limits is:

$$d = \left(\frac{365,000 \text{ tons} + 55,480 \text{ tons}}{730 \text{ hr}} \right) \left(\frac{1 \text{ truck}}{35 \text{ tons}} \right) \left(\frac{24 \text{ hrs / day}}{12 \text{ hrs typical operation / day}} \right) = \frac{13.6 \text{ trucks}}{\text{hr}} (\text{one way})$$

The vehicle traffic for 165 based on monthly (730 hours) production limits is:

$$d = \left(\frac{55,480 \text{ tons}}{730 \text{ hr}} \right) \left(\frac{1 \text{ load}}{12 \text{ tons}} \right) \left(\frac{24 \text{ hrs / day}}{12 \text{ hrs typical operation / day}} \right) = \frac{12.7 \text{ trucks}}{\text{hr}} (\text{one way})$$

Average quarry traffic is then = 13.2 trucks/hr

The desired control efficiency is 95 percent. The corresponding application intensity is calculated as:

$$\begin{aligned} 95\% \text{ control} &= 100 - \frac{0.8(0.196)(13.2)(12)}{i} \\ i &= \frac{24.3}{5} \\ &= \frac{5.0 \text{ liters}}{\text{m}^2} = \frac{0.12 \text{ gal}}{\text{ft}^2} \end{aligned}$$

¹Cowherd, Jr., Chatten and John S., and John S. Kinsey, Air Pollution Engineering Manual, AWMA, 1992, pp. 141-144.

Exhibit "B"
Page 2 of 9

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These vehicles are approximately 10 feet wide. The water truck sprays a 20 foot wide path, and consequently waters both sides of the haul road on one pass. The volume of water per linear foot is calculated as 0.12 gal/ft²

$$= \frac{0.12 \text{ gal}}{\text{ft}^2} (20 \text{ feet}) = \frac{2.4 \text{ gal}}{\text{ft}}$$

Sources 155, 160, and 165 travel a combined one way distance of (0.5 miles + 0.095 miles) = 0.595 miles

The volume of water required per day (12 hours of quarry operation) is:

$$= 0.595 \text{ miles} \left(\frac{5,280 \text{ ft}}{\text{mile}} \right) \left(\frac{2.4 \text{ gal}}{\text{ft}} \right) = 7,540 \text{ gallons / day}$$

4.2.2 Plant Roads

Paved Roads 691-1, 692-1, and 695-1: Plan A: Water flushing followed by sweeping.

The control efficiency of paved road watering/sweeping depends on the:

- Amount of water applied
- Traffic frequency

An empirical model for the performance of water flushing followed by sweeping as a control technique has been developed.² The model is as follows:

$$C = 96 - 0.263V$$

where:

C = control efficiency, %

V = number of vehicle passes since application

Equation assumes water applied at 0.48 gal/sq.yd. = 0.053 gal/sq.ft.

With a 20 foot coverage area, the number of gallons per linear foot is:

$$\left(\frac{0.053 \text{ gal}}{\text{ft}^2} \right) (20 \text{ ft path}) = \frac{1.06 \text{ gal}}{\text{ft}}$$

A control efficiency of 90 percent is desired for paved roads. The equation provides an instantaneous efficiency rather than an average. Therefore, the average must be

²Cowherd, Jr., Chatten and John S., and John S. Kinsey, Air Pollution Engineering Manual, AWMA, 1992, pp. 145.

calculated. Immediately after sweeping, $C = 96\%$, it then decreases with the number of passes. To achieve an average efficiency of 90%, the efficiency must remain between 84% and 96%. The number of vehicle passes to achieve 90% is calculated as

$$84 = 96 - 0.263V$$

$$V = \frac{12}{0.263} = 45.6 \text{ vehicle passes between applications}$$

Calculations:

Rail unloading sources include 691-1, 692-1, and 695-1. The rail unloading process can only fill three trucks/hr therefore the vehicle passes are fixed. As the rail unloading is a daylight process, 12 hour day, the maximum number of trucks per day is estimated as 36. Therefore one pass per day of the watering truck and sweeper will be sufficient.

The distance traveled varies significantly with the material being unloaded. The maximum distance traveled is for clay. The water required is calculated as follows:

$$\text{Volume} = (0.74 \text{ miles}) \left(\frac{5,280 \text{ feet}}{\text{mile}} \right) \left(\frac{1.06 \text{ gal}}{\text{ft}} \right) = \frac{4,142 \text{ gal}}{\text{day}}$$

Paved Road 1301-1: Plan A: Water flushing followed by sweeping.

The source, 1301-1, Cement Loadout, has a monthly production limit of 262,800 tons.

$$d = \left(\frac{262,800 \text{ tons}}{730 \text{ hr}} \right) \left(\frac{1 \text{ load}}{50 \text{ tons}} \right) = \frac{7.2 \text{ trucks}}{\text{hr}} = \frac{173 \text{ trucks}}{\text{day}}$$

As 45.6 passes are calculated as "V", re-applications of water and sweeping would be required every 6.3 hours. The vehicles have a distance of 0.080 miles = 422 feet. At 1.06 gal/sq.ft, 448 gallons are required every 6.3 hours. Alternatively, 853 gallons every 12 hours, or 1700 gallons per day.

Sources 765-1 and 765-2, transporting raw materials from the storage hall to the 0765 feeder, are the same vehicle traveling on half paved road and half unpaved road. The distance for each is 220 feet. The source is limited to 50,400 tons of raw material while the kiln is in operation.

Paved Road 765-2: Plan A: Water flushing followed by sweeping.

$$d = \left(\frac{50,400 \text{ tons}}{730 \text{ hr}} \right) \left(\frac{1 \text{ load}}{12 \text{ tons}} \right) = \frac{5.75 \text{ loads}}{\text{hr}} = \frac{138 \text{ loads}}{\text{day}}$$

Exhibit "B"
Page 4 of 9

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The base rate of re-application is 138 trips/day/(V= 45.6 passes between applications) = 3 applications/day.

The required volume of water per application is:

$$\text{Volume} = 220 \text{ ft} \left(\frac{1.06 \text{ gal}}{\text{ft}} \right) = \frac{233 \text{ gal}}{\text{application}}$$

Alternatively, 466 gallons can be applied per 16 hour period, or 700 gallons once per day.

Unpaved Road 763-1: Plan A: Watering.

The number of trips/hr was calculated above. The intensity of water application is:

$$\begin{aligned} 95\% \text{ control} &= 100 - \frac{0.8(0.196)(5.75)(24)}{i} \\ i &= \frac{21.6}{5} \\ &= \frac{4.3 \text{ liters}}{\text{m}^2} = \frac{0.11 \text{ gal}}{\text{ft}^2} \end{aligned}$$

The volume of water per linear foot is:

$$= \frac{0.11 \text{ gal}}{\text{ft}^2} (20 \text{ feet}) = \frac{2.2 \text{ gal}}{\text{ft}}$$

The total volume of water is:

$$= 220 \left(\frac{2.2 \text{ gal}}{\text{ft}} \right) = \frac{466 \text{ gal}}{\text{day}}$$

Exhibit "B"
Page 5 of 9

Plan A - Summary for Paved and Unpaved Roads

Plan A can achieve 95 percent control of fugitive PM₁₀ emissions with the associated sources operating at maximum capacity, if the following volumes of water are applied once per day.

Quarry Roads = 7,500 gallons (maximum)

Plant Roads = 7,000 gallons (maximum)

Plan C - Unpaved Roads: Chemical Dust Suppressant

Apply a chemical dust suppressant to bring the ground inventory to 0.25 gal (concentrate)/sq. yd. After the initial application, re-applications will be applied every two weeks at a rate of 0.05 gal(concentrate)/sq. yd. to achieve 95 percent control. (Air Pollution Engineering Manual, Figure 6, Page 144). This applies to unpaved roads 155, 160, and 165. The total distance is 0.595 miles. The corresponding total square yards, assuming a 20 foot wide road, is 6,981. The initial application of chemical dust suppressant required to achieve a ground inventory of 0.25 gallons per square yard equals 1,745 gallons concentrate. The re-application rate will be 349 gallons concentrate every two weeks.

Plan D - Paved Roads: High Pressure Washing

A high pressure washing system will be used as an alternative to "water flushing followed by sweeping." The water volumes required are the same as calculated for Plan A for plant roads. However, the pressurized water spraying system washes the particles from the pavement, and forces the particles off of the path of travel, all in one pass.

Plan D can achieve 95 percent control of fugitive PM₁₀ emissions with the associated sources operating at maximum capacity, if the following volumes of water are applied once per day.

Plant Roads = 7,000 gallons (maximum)

Exhibit "B"

Page 6 of 9

Recordkeeping:

Lafarge will maintain a daily log of the following:

1. The date and time
2. The specific watering plan being used
3. The volume of water or other dust suppressant applied (if applicable to the plan being utilized), and
4. The distance traveled (if applicable to the plan being utilized).

Or

- 5a. The amount and type of precipitation, if the daily precipitation is greater than 0.2 inches. (The calculations listed below indicate that additional watering beyond 0.2 inches of precipitation will not be needed to achieve 95 percent control).
- 5b. If the ambient temperature during the day is less than 35°F. or conditions due to weather in combination with the application of water or dust suppressant would create dangerous conditions, then the fugitive dust plan will be postponed for that operating day and the temperature will be recorded in a log.
- 5c. Records to demonstrate that the source will not be in operation during the operating day, such that fugitive dust controls will not be required (as described in the following pages).

Exhibit "B"
Page 7 of 9

Fugitive Dust Plan Exception: The fugitive dust plan, regardless of the specific plan, will be postponed if the following amount of precipitation is obtained during the day (as 95 percent control will be achieved from precipitation, and no further control beyond 95 percent, is required).

Quarry:

$$\begin{aligned}
 i &= \frac{5.0 \text{ l}}{\text{m}^2} = \frac{0.12 \text{ gal}}{\text{ft}^2} \\
 &= \frac{5,000 \text{ cm}^3}{\text{m}^2} \\
 &= \frac{5,000 \text{ cm}^3}{10,000 \text{ cm}^2} \\
 155, 160, \& 165 &= 0.5 \text{ cm of rain} = \frac{0.2 \text{ inches}}{\text{day}}
 \end{aligned}$$

Plant:

$$\begin{aligned}
 i &= \frac{0.053 \text{ gal}}{\text{ft}^2} = \frac{0.201 \text{ l}}{\text{ft}^2} \\
 &= \frac{2.2 \text{ l}}{\text{m}^2} \\
 &= \frac{2,200 \text{ cm}^3}{10,000 \text{ cm}^2} \\
 691-1, 692-1, \& 695-1 &= 0.22 \text{ cm of rain} = \frac{0.09 \text{ inches}}{\text{day}} \\
 1301-1 &= 4(0.22 \text{ cm}) = \frac{0.35 \text{ inches}}{\text{day}} \\
 765-2 &= 2(0.22 \text{ cm}) = \frac{0.17 \text{ inches}}{\text{day}} \\
 765-1 &= \frac{0.11 \text{ gal}}{\text{ft}^2} \cong \frac{0.2 \text{ inches}}{\text{day}} \\
 \text{average} &= \frac{0.2 \text{ inches}}{\text{day}}
 \end{aligned}$$

Therefore 95 percent fugitive dust control will be achieved, for both the plant and quarry roads, if greater than 0.2 inches of precipitation is received during the day.

Fugitive Dust Plan Exception: If the ambient temperature during the day is less than 35°F. or conditions due to weather in combination with the application of water or dust suppressant would create dangerous conditions, then the fugitive dust plan will be postponed for that operating day and the temperature will be recorded in a log.

Exhibit "B"
Page 8 of 9

Fugitive Dust Plan Exception (Quarry): If the quarry is not in operation during an operating day, the fugitive dust plan will be postponed for that operating day. Records will be kept to demonstrate that the quarry was not operating.

Fugitive Dust Plan Exception (Plant): If the plant is not in operation during an operating day, the fugitive dust plan will be postponed for that operating day, and records will be kept to demonstrate that the plant was not operating.

On weekends, plant traffic is usually less than 10 percent of that on weekdays. On days when plant traffic will be less than 10 percent of maximum, the fugitive dust plan will be postponed for that day. The justification for this exemption, is that the uncontrolled emission rate from 17 trucks is mathematically the same, or less, than the fugitive dust from 173 trucks at 90 percent control. The largest plant haul road fugitive dust source is number 1301 (trucks hauling out cement). 10 percent of the maximum daily number of cement trucks corresponds to approximately 17 trucks. Therefore, if less than 17 truckloads of cement will be sent on a day, the fugitive dust plan will be postponed for that day, and a record of the number of cement trucks during the day will be kept.

Exhibit "B"
Page 9 of 9

Exhibit - C. Fugitive Sources: Monthly Limits - Lafarge Corporation, Davenport Plant.

Emission Unit No.	Source Description	Monthly Limits	Basis ¹
0070-1-F	Raw Materials Loading in Quarry	365,000	tons raw materials to crusher
0081-1-F	Quarry Drilling Fugitives	365,000	tons raw materials to crusher
0110-2-F	Storage Pile Load In/Out	55,480	tons clay to crusher
0120-2-F	Storage Pile Load In/Out	55,480	tons clay to crusher
0130-2-F	Storage Pile Load In/Out	55,480	tons clay to crusher
0155-1-F	Quarry Haulroad - Rock	365,000	tons limestone to crusher
0160-1-F	Quarry Haulroad - Clay	55,480	tons clay to crusher
0165-1-F	Haulroad - Clay from Storage Piles to Crusher	55,480	tons clay to crusher
0200-1-F	0235 - Filling Clay Hopper	128,480	tons alternative raw materials and clay to kiln
0200-2-F	0232 - Filling Stone Hopper	365,000	tons raw materials to crusher
0200-3-F	0235 Belt Transfer to 0230	128,480	tons alternative raw materials and clay to kiln
0200-4-F	0232 Belt Transfer to 0230	365,000	tons raw materials to crusher
0200-5-F	0230 Belt Transfer to 0225 Crusher	365,000	tons raw materials to crusher
0200-6-F	0225 Crusher Transfer to 0221	365,000	tons raw materials to crusher
0200-7-F	0221 Belt Transfer to 0208	365,000	tons raw materials to crusher
0200-8-F	0225 Crushing Fugitives	365,000	tons raw materials to crusher
0203-1-F	Transfer House Material Transfer Fugitives	365,000	tons raw materials to crusher
0300-1-F	0387 Belt Transfer to 0360	365,000	tons raw materials to crusher
0300-2-F	0387 Belt Transfer to 0341	365,000	tons raw materials to crusher
0300-3-F	Stacking 0341 to Pile	365,000	tons raw materials to crusher
0300-4-F	Reclaim of Pile to Belt 0332	365,000	tons raw materials to crusher
0387-1-F	Belt Conveyor Over Road	365,000	tons raw materials to crusher
0400-1-F	0493,0495,0497 Bins to 0489 Belt	365,000	tons raw materials to crusher
0691-1-F	Haul Road - Rail Unloading Raw Materials	55,480	tons clay to kiln
0692-1-F	Haul Road - Rail Unloading Clinker	262,800	tons cement production
0695-1-F	Haul Road - Rail Unloading Fuel	32,761	tons fuel usage
0765-1-F	Haulroad to 0765 Feeder - Unpaved	262,800	tons cement production
0765-2-F	Haulroad to 0765 Feeder - Paved	262,800	tons cement production
0800-2-F	0703 Gypsum Transfer to 0867	17,082	tons gypsum usage
0802-1-F	0802 Nodulizer Dust Collector Fugitives	10,646	tons CKD production
1300-1-F	Rail Loading Fugitives	262,800	tons cement production
1300-2-F	Truck Loading Fugitives	262,800	tons cement production
1301-1-F	Haulroad - Truck Loadout of Cement	262,800	tons cement production
2601-1-F	Barge Loading Spout Fugitives	262,800	tons cement production

¹ Following is a list of the parameters that will be recorded in a monthly log to demonstrate compliance with the monthly limits listed

Plant process	Monthly Limit	Specific parameter recorded
Quarry =	365,000	tons raw materials to crusher
Quarry =	55,480	tons clay to crusher
Kiln =	128,480	tons alternative raw materials and clay to kiln
Kiln =	55,480	tons clay to kiln
Kiln =	32,761	tons fuel usage
Kiln =	10,646	tons CKD production
Finish Mill =	262,800	tons cement production
Finish Mill =	17,082	tons gypsum usage

Exhibit D. Allowables for Dust Collectors (D.C.)

Emission Point No.	Dust Collector Unit No.	Description	Allowable Emission Rate (lb PM-10/hr)
0081-0	0081-1	Quarry Drill D.C.	0.13
0203-0	0203-1	Transfer House D.C.	0.20
0218-0	0218-1	Crusher D.C.	1.54
0327-0	0327-1	D.C. at Dome	0.09
0404-0	0404-1	Homogenization Silo D.C.	0.85
0420-0	0420-1	Raw Mill Air Slides D.C.	0.14
0466-0	0466-1,2	Kiln/Raw Mill and Alkali Bypass D.C.s	75.0
0498-0	0498-1	0489 Belt D.C.	0.32
0504-0	0504-1	Kiln Feed System D.C.	0.32
0611-0	0611-1	Clinker Cooler D.C.	17.92
0667-0	0667-1	Coal Mill D.C.	2.19
0684-0	0684-1	Coal Silo D.C.	0.27
0709-0	0709-1	Clinker Handling D.C.	0.25
0723-0	0723-1	Clinker Silo Reclaim D.C.	0.16
0743-0	0743-1	Clinker Handling D.C.	1.18
0811-0	0811-1	Finish Mill Holding Bin D.C.	0.07
0817-0	0817-1	Finish Mill D.C.	2.53
0822-0	0822-1	Finish Mill Air Sep. D.C.	1.08
0950-0	0950-1	Barge Loading Silo D.C.	1.02
1007-0	1007-1	Cement Silo D.C.	0.10
1017-0	1017-1	Cement Silo D.C.	0.10
1027-0	1027-1	Cement Silo D.C.	0.08
1033-0	1033-1	Cement Silo D.C.	0.10
1037-0	1037-1	Cement Silo D.C.	0.21
1044-0	1044-1	Bulk Truck Loadout D.C.	0.08
1045-0	1045-1	Bulk Truck Loadout D.C.	0.08
1046-0	1046-1	Cement Silo D.C.	0.05
1047-0	1047-1	Center Spout over Tracks D.C.	0.06
1048-0	1048-1	Railcar Loadout Spouts Silo D.C.	0.06
1183-0	1183-1	Backup Packing Machine D.C.	0.29
1257-0	1257-1	Mason Packing Machine D.C.	0.16
1263-0	1263-1	Portland Packing Machine D.C.	0.16
1310-0	1310-1	Vaculoader	0.06
1320-0	1320-1	Vaculoader	0.06
2601-0	2601-1	Barge Loading Spout D.C.	0.06

Exhibit "E"

Iowa DOT Agreement No. 94-16-069

STAFF ACTION NO. 5-94-491

AGREEMENT

County Scott
Project No. Iowa 22
Iowa DOT
Agreement No. 94-16-069

This AGREEMENT, made and entered into by and between the State of Iowa, Iowa Department of Transportation (herein DOT), and the "Lafarge Corporation" (previously "Davenport Cement Co."), an Iowa general partnership, (hereafter COMPANY) as follows:

WITNESSETH; that

WHEREAS, the COMPANY and the DOT previously entered into Agreements for vehicles to cross Iowa Highway No. 22 in the City of Buffalo in Scott County, Iowa. The Agreements were signed by the COMPANY and the DOT on September 1 and 14, 1987, and August 20 and 30, 1990, respectively, and;

WHEREAS, Chapter 321E, Code of Iowa, authorizes the Iowa Department of Transportation to issue special permits; and

WHEREAS, the DOT is willing to extend the terms of the Agreements to the COMPANY for the crossing of Iowa Highway No. 22 for the purpose of transporting limestone materials from the north side quarry to the COMPANY's south side plant, subject to the stipulation hereinafter set forth.

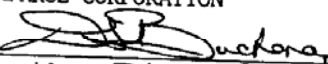
NOW THEREFORE, in consideration of these premises and the mutually dependent covenants herein contained, it is agreed as follows:

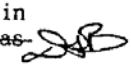
1. The COMPANY agrees that only one (1) point of ingress and one (1) point of egress, opposite one another at Station 262+20 shall be utilized in crossing Iowa Highway No 22 with the vehicles covered by special permit in accord with the terms of this Agreement.
2. The DOT shall furnish and install advance warning signs on Iowa Highway No. 22 in advance of the crossing in compliance with the Iowa Manual on Uniform Traffic Control Devices for Streets and Highways.
3. The COMPANY agrees to remove immediately any and all foreign material which may be deposited on the Iowa 22 roadbed as a result of the COMPANY's operations under this Agreement.

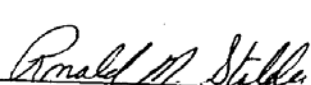
4. The COMPANY shall indemnify and save harmless the DOT and the State of Iowa from any and all causes of action, suits of law or in equity, or losses, damages, claims, or demands, and from all liability of whatsoever nature for and on account of or due to any error, omission or negligent act of the COMPANY, its members employees, agents, subcontractors, or assigns, arising out of or in connection with this Agreement of the performance of any part thereof or for any accident which may occur as a result of the COMPANY vehicles using the crossing.
5. If future rehabilitation at the crossing at Station 262+20 on Iowa Highway No. 22 becomes necessary, it is understood and agreed that the DOT shall have the responsibility of deciding the proper highway rehabilitation, including all phases thereof.
6. The DOT shall perform any required future rehabilitation work and will bill the COMPANY for the actual cost of that portion of the rehabilitation work attributed to the COMPANY's use of the crossing at Station 262+20 by vehicles covered by special permits.
7. The COMPANY agrees to reimburse the DOT for the actual cost of that portion of the rehabilitation at the crossing at Station 262+20 attributed to the COMPANY's use of the crossing by vehicles covered under specific permits. Failure by the COMPANY to reimburse the DOT shall cause cancellation of this Agreement by written notification to the COMPANY by the DOT. After the COMPANY's use of Iowa 22 under this Agreement has been terminated, the DOT will assess the roadway damage and bill the COMPANY for said costs based on the actual quantities in place and the accepted contract bid.
8. The DOT shall issue an annual permit(s) to the COMPANY upon application therefore for each vehicle used in transporting the limestone material over the crossing. The charge for the permit(s), payable in advance to the DOT, shall be at the then current rate per vehicle per year.
9. The terms of this Agreement shall be extended for a period of three (3) additional (consecutive) years. Prior to the expiration date, the COMPANY may, in writing, request that the Agreement be extended again.
10. The COMPANY agrees to comply with any and all provisions set forth in Chapter 321E, Code of Iowa. Failure by the COMPANY to comply with said Code provisions or terms of this Agreement shall constitute sufficient cause for the DOT to void this Agreement immediately.
11. This Agreement may be executed in two counterparts, each of which so executed shall be deemed to be an original and both shall constitute but one and the same instrument.

IN WITNESS WHEREOF, each of the parties hereto has executed Agreement No. 94-16-069 as of the date shown opposite its signature below.

LAFARGE CORPORATION

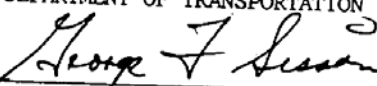
BY 
~~President~~ Plant Manager

On this 7th day of October, 1993, personally appeared duly sworn did say that he is Doug Buchanan of the LaFarge Corporation and that said instrument was signed and executed by him in behalf of the said Corporation ~~by authority of its Board of Directors as its voluntary act and deed.~~ 

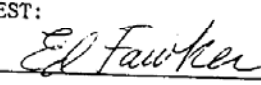

 Notary Public in and for said State

Executed by the DOT this 3rd day of Nov., 1993.

IOWA DEPARTMENT OF TRANSPORTATION

BY 
 George F. Sisson
 Deputy Director-Development
 Highway Division

ATTEST:

BY 

STAFF ACTION NO. S-97-593

**ADDENDUM TO
AGREEMENT 94-16-069**

County Scott

Lafarge Corporation

Project No. Iowa 22

Iowa DOT

Addendum No. 97-A-056

IT IS AGREED between the State of Iowa, Iowa Department of Transportation (herein DOT), Maintenance Division and the Lafarge Corporation in Scott County, Iowa, (herein COMPANY) as follows:

1. The COMPANY is currently conducting hauling operations across Iowa 22 within the City of Buffalo for the purpose of transporting limestone materials from the COMPANY'S north side quarry to the south side of Iowa 22.
2. The COMPANY and DOT previously entered into Agreement 94-16-069 for the above referenced hauling operations. The Agreement was signed by the COMPANY and DOT on October 7 and November 3, 1993 respectively.
3. The COMPANY, per a September 24, 1996 letter, has requested an extension of the agreement for hauling operations on Iowa 22 in the City of Buffalo in Scott County Iowa (see Exhibit A attached).
4. The terms and conditions contained in previously executed Agreement 94-16-069 (see section 2 above) shall be extended for a period of five (5) years. Prior to the expiration date, the COMPANY may, in writing, request that the Agreement be extended again. For the purpose of this Addendum, the "expiration date" shall be defined as; five (5) years subsequent to the date of the COMPANY'S signature on this Addendum.
5. All provisions contained in previously executed Agreement 94-16-069 which are not revised or in any way affected by this addendum shall remain in full force and effect.
6. If any section, provision, or part of this Addendum shall be found to be invalid or unconstitutional, such judgment shall not affect the validity of the

Addendum as a whole or any section, provision, or part thereof not found to be invalid or unconstitutional.

7. This Addendum may be executed in two counterparts, each of which so executed shall be deemed to be an original.
8. Any subsequent change or modification to the terms of this Addendum shall be in the form of a duly executed Amendment to this Addendum.

IN WITNESS WHEREOF, each of the parties hereto has executed Preconstruction Agreement No. 97-A-056 as of the date shown opposite its signature below.

LAFARGE CORPORATION:

BY: *George J. Korte*
 President *Plant Manager*

On this 19 Day of NOV, 1996, personally appeared duly sworn did say that *Plant Manager* he is ~~President~~ of the Lafarge Corporation and that said instrument was signed and executed by him on behalf of said Corporation by authority of its Board of Directors as its voluntary act and deed.

Ronald M. Stiller
 Notary Public in and for the State of Iowa

IOWA DEPARTMENT OF TRANSPORTATION:

BY: *Neil Volmer* *12/16/96*, 1996
 Neil Volmer Date
 Director
 Maintenance Division

Attest: *Ed Fawkes*

Appendix B: Operation & Maintenance Plans

Lafarge North America- Davenport Plant Operations & Maintenance Plan

Davenport Plant
301 E. Front St.
PO Box 690
Buffalo, IA 52728

TABLE OF CONTENTS

1.0	Introduction
1.1	Process Description
1.2	System Definition
2.0	RAW MATERIAL PREPARATION SYSTEM
3.0	PYROPROCESSING (KILN) SYSTEM, COAL/COKE HANDLING SYSTEM
4.0	PYROPROCESSING (CLINKER COOLER) SYSTEM
5.0	CEMENT PRODUCTION SYSTEM
6.0	CEMENT SHIPPING SYSTEM
7.0	COMBUSTION SYSTEM INSPECTION

1.0 Introduction

Lafarge North America owns and operates a cement manufacturing plant on its property in Scott County, approximately one-mile northeast of Buffalo, IA. The Lafarge-Buffalo property encompasses approximately 740 acres, situated at approximately 41 degrees, 28 minutes north latitude and 90 degrees, 41 minutes west longitude along Highway 22. The operation includes an open pit mine quarry north of the highway and a cement manufacturing plant south of the highway that includes a long, dry cement kiln, a preheater / precalciner tower and a finish mill. The location of the facility is shown on Figure 1-1.

The plant street address is:
Cement Group / Davenport Iowa
301 E. Front Street
Buffalo, IA 52728

The facilities are subject to regulation under 40 CFR 63 Subpart LLL, National Emission Standards for Hazardous Air Pollutants from the Portland Cement Manufacturing Industry (PC MACT Standards) and must be in compliance with the standards by June 14, 2002. In order to be in compliance, Lafarge has developed the compliance plans required to satisfy the PC MACT standards including these Operations and Maintenance Plans for each system at the plant.

1.1 Process Description

Lafarge obtains the primary raw material (limestone) for Portland cement manufacturing from an open pit mine adjacent to the cement plant. The limestone is crushed using a Humboldt Wedag impact type crusher with a capacity of 1300 tons per hour of minus 60" quarry run to 95% minus 3 ½" product.

The crushed limestone is carried across highway 22 via a belt conveyor to the top of a storage dome on the plant side. The conveyor discharges to a motor operated 2-way gate which directs the material either to the stacker belt conveyor for building a storage pile in the dome with a 15,000-ton capacity, or to another belt conveyor (360). 360-belt conveyor discharges the material to another motorized 2-way gate that directs the material either to the "high" lime silo with a capacity of 500 tons or to the "low rock" silo with a capacity of 2,000 tons.

The "low rock" mixture is reclaimed from the dome storage using a slope-raking system consisting of adjustable harrows. The harrows rake the face of the pile in a radial, back and forth motion causing a uniform layer of material from the entire pile face to flow to a scraper conveyor. The conveyor forces the material to the center column and discharges to a surge bin with a 100-ton capacity.

"Low rock" and "high rock" are discharged from their respective bins and fed proportionally to the raw mill rotary air lock, which discharges directly to an Allis Chalmers roller mill with a SLF 6150 classifier. The rated capacity of the raw mill is 230 stph with a feed size of minus 4 inches to a fineness of 85% minus 200 mesh, while simultaneously drying the raw mix from a moisture content of 8.6% to ½%.

The raw mix from the roller mill is pneumatically conveyed via an airlift to the top of a homogenizing silo with a capacity of 10,000 tons. Another vertical airlift conveys material from the homogenizing silo (kiln feed) to the top of a preheater tower to a level storage bin. From the bin material is fed to an air duct between stages 1 and 2 of a 4-stage preheater/precalciner.

The preheated material is fed to a coal-fired precalciner where the material and fuel are premixed before being introduced to a combustion air stream. The precalcined material then enters a long dry rotary kiln that is coal fired through a combination burner pipe with oil nozzles used for warm up and start up.

Clinker is discharged from the kiln into an air quenching moveable grate clinker cooler in which ambient air is blown up through the bottom of the cooler and up through the clinker bed. The hot air exiting the cooler is recycled to several different areas in the process.

Up to 50% of the kiln exhaust gases entering the preheater can be sent to an alkali bypass system in order to decrease the amount of alkalis and sulfur in the clinker product and to minimize buildup and plugging. The hot kiln gases are quenched through intermixing of ambient air. The gases leaving the quench chamber are then passed through a water spray gas conditioning tower for further cooling before entering a dust collector.

Coal is reclaimed from its large outdoor storage pile through underground hoppers with vibrating feeders and fed to a 1250-ton storage silo. From the silo, coal is fed to a bowl mill where it is crushed and then conveyed to 2 – 5 ton tanks. 70% of the coal is used to fuel the precalciner and the remaining 30% is consumed in the kiln burner pipe.

Clinker discharges from the clinker cooler to a series of drag conveyors and elevators that eventually lead to one drag conveyor that can discharge the clinker into one of 2 – 37,500 ton silos. From the silos, clinker is conveyed to one of two finish mill storage bins and a third bin is used to store gypsum and can be filled with a front-end loader.

Proportioned amounts of clinker and gypsum are fed to a 15-foot diameter, 51-foot long Allis Chalmers two compartment ball mill with a capacity of 180 tph. The cement product discharged from the mill passes through either a static separator, an air separator, or both. The fine material that makes its way through the separation process is passed through one of two cement coolers and then conveyed to storage silos in the shipping department.

1.2 System Definition

Based on the process description described above, Lafarge has divided operations at the cement plant into the following five systems:

1. Raw Material Preparation
2. Kiln, Coal/Coke Handling
3. Clinker Cooler
4. Cement Production
5. Cement Shipping

PC MACT Operations and Maintenance Plan

Raw Material Preparation System

1.0 Source Description

The Raw Material Preparation System is used to grind and combine raw materials prior to feeding them into the pyroprocessing systems. Its three main system components are:

- A raw material preparation system that reclaims individual raw materials and delivers them to the raw mill. The system includes the preblend dome, the limestone silos, and the reclaim conveyors used to deliver material to the raw mill.
- A raw grinding system that prepares raw materials for combination. The system includes the in-line raw mill.
- A homogenization silo (preheater/kiln feed) system that combines and stores raw material mixture prepared for feed to the pyroprocessing system.

2.0 System Emission Points and Air Pollution Control Equipment

During Raw Material Preparation System operations, particulate matter are emitted at several emission points. The system includes five different baghouses to control particulate matter emissions during raw material preparation system operations. The following table summarizes system emission points and applicable air pollution control devices (APCDs), as well as the visual inspection interval (see Section 6.0):

Emission Point #	Description	Air Pollution Control Device	Equipment #	VE Inspection Interval
0404	Dust Collector – Homogenization Silo	Dust Collector Baghouse	31040400	Monthly
0420	Dust Collector – Raw Mill Airslides	Dust Collector Baghouse	31042000	Monthly
0466	Dust Collector – In-line Raw Mill and Kiln	Dust Collector Baghouse	31046600	NA-COM
0498	Dust Collector – Raw Mill Feed	Dust Collector Baghouse	31049800	Monthly

The dust collector baghouse for the in-line roller mill also services the kiln and preheat tower portions of the pyroprocessing system.

3.0 Applicable Emission Limit

The emission limits applicable to the Raw Material Preparation System are the following:

- For the raw mill (40 CFR 63.1343): This will be covered in the O&M plan for the Pyroprocessing – Kiln System
- For other equipment in the raw material preparation system (40 CFR 63.1348): Visible emissions must not exceed 10 percent opacity.

4.0 Operator Procedures for Minimizing Visible Emissions From the Raw Material Preparation System During Normal Raw Material Preparation

Raw Material Preparation System operations are performed in accordance with the Lafarge Standard Operating Procedure (SOP) documents for Raw Material Preparation, Raw Material Grinding, and Homo Silo (Preheater/Kiln Feed). Applicable SOPs include the following:

- Raw Mill—Normal Operation
- Homogenizing Silo—Normal Operation

These procedures are part of the plant's electronic operating procedures system, which is maintained and kept current on the plant's network drive (F:/shared/environmental/O&M). The SOPs discuss how the plant shall be operated, and are used for job-specific training. The tasks necessary to ensure proper operation of the Raw Material Preparation System with minimum emissions are also included within the SOPs.

5.0 Preventive Maintenance

Preventative maintenance work orders are maintained on MAXIMO, the Plant's Windows-based electronic maintenance management system. Sample work orders are included in the appendices. All items on work orders are checked, but not recorded unless values are out of normal operating range. Maintenance Department technicians perform preventative maintenance (PM) tasks on the Raw Material Preparation System equipment, including:

Equipment #	Equipment Description – Function
21020200	Exhaust Fan – Dust Collector 203
21020300	Dust Collector – 207 Flop Gate, Head of 208 Belt, Tail of 387 Belt
21021600	Screw Conveyor – Dust Collector 218
21021700	Exhaust Fan – Dust Collector 218
21021800	Dust Collector – 225 Crusher, Head of 221 Belt, Tail of 208 Belt
31032700	Dust Collector – Dome, Reclaimer Tunnel, Tail of 320 Belt
31040300	Exhaust Fan – Dust Collector 404
31040400	Dust Collector – Homogenization Silo
31040500	Screw Conveyor – Dust Collector 405
31041900	Exhaust Fan – Dust Collector 420
31042000	Dust Collector – Roller Mill Airslides
31044000	Dust Collector – 475 Motor Cooling, ER 3A, ER 3B
31044100	Exhaust Fan – Dust Collector 440
31044200-31045800	Screw Conveyors 442-448, 452-458 – Dust Collector 466
31046600	Dust Collector – Kiln, In-line Raw Mill
31046700	Exhaust Fan – Dust Collector 466
31049800	Dust Collector – Raw Mill Feed
31049900	Exhaust Fan – Dust Collector 498

The Raw Material Preparation System PM schedule is maintained on MAXIMO. The PM schedules and the PM task lists for equipment in the Raw Material Preparation System are based upon past experience with similar equipment and the manufacturer's documentation/recommendations.

Maintenance Technicians utilize checklists from the MAXIMO database to conduct PM activities. The checklists include detailed steps and instructions for performance of these activities. Once work completion

has been verified, checklist data is entered into MAXIMO. This and other relevant information are periodically archived within the database, establishing a verifiable record of ongoing PM activity completion and providing a method by which to review historical equipment performance.

6.0 Monitoring Requirements

6.1 Opacity Monitoring Requirements

The in-line roller mill baghouse opacity monitoring requirements will be included in the O&M plan for the Pyroprocessing – Kiln System.

6.2 Periodic Method 22 Visible Emissions Monitoring Requirements

As referenced in the table in Section 2.0, other parts of the Raw Material Preparation System, including the conveyors, limestone silo, homogenization silo will be tested for visible emissions once each month using USEPA Method 22 – Visual Determination of Fugitive Emissions from Material Sources and Smoke Emissions from Flares. The Method 22 tests will be conducted by trained observers while the Raw Material Preparation System is in operation. The Maintenance Manager (or a designated representative) will schedule the Method 22 testing. Copies of the Method 22 procedures, Field Data Worksheets, and equipment needed to conduct the tests (stopwatch, etc.) will be maintained in the Environmental Department.

As noted in the Method 22 procedures, observers will take care to perform the test from the proper location relative to the source and the sun, as well as to avoid degraded visibility of emissions caused by improper background contrast, ambient lighting, and observer position relative to lighting and wind.

During the Method 22 test, the observer should determine the presence or absence of visible emissions at points above or beyond the baghouse exhaust vents and stacks. The duration of the Method 22 tests will be one minute. Upon completion of the test, the observer will record the results on the Method 22 Field Data Worksheet, and submit the worksheet to the Maintenance Manager, who will forward the results to the Environmental Manager (or a designated representative). The Environmental Manager (or a designated representative) will maintain the Method 22 records for a period of five years.

If visible emissions are noted during a monthly Method 22 test, the observer will immediately notify the Environmental Manager (or a designated representative) so that a six-minute Method 9 test can be started within one hour of the initial observation.

Note: If monthly Method 22 tests indicate no visible emissions for six consecutive monthly tests, the test frequency may be reduced to once every six months. If no visible emissions are detected on the next six-month test, the test frequency may be reduced to once per year. Any time visible emissions are detected by these Method 22 tests, monthly testing must be resumed [40 CFR 63.1350(a)(4)(ii) & (iii)].

6.3 Periodic Method 9 Opacity Tests

Whenever visible emissions are observed during a Method 22 test of the Raw Material Preparation System, an opacity test using the procedures described in USEPA Method 9 – Visual Determination of the Opacity of Emissions from Stationary Sources must be performed to determine if the 10 percent opacity limit is being met. If visible emissions are observed during the one-minute Method 22 test, a six-minute Method 9 test must be conducted within one hour of the initial observation.

The Environmental Manager (or a designated representative) will ensure that trained and certified Method 9 observers are available each day the Method 22 testing is conducted on the Raw Material Preparation System. Copies of the Method 9 procedures, Field Data Worksheets, and equipment needed to conduct the tests will be maintained in the Environmental Department.

As noted in the Method 9 procedures, observers will take care to perform the test from the proper location relative to the source and the sun, as well as to avoid degraded visibility of emissions caused by improper background contrast, ambient lighting, and observer position relative to lighting and wind.

During the Method 9 test, the observer should determine the opacity of visible emissions plume at points above or beyond the baghouse exhaust vents and stacks. The duration of the Method 9 test will be six minutes. Upon completion of the test, the observer will record the results on the Method 9 Field Data Worksheet, and submit the worksheet to the Environmental Department. The Environmental Manager (or a designated representative) will maintain the Method 9 records for a period of five years.

The observer will notify the Environmental Manager (or a designated representative) and initiate corrective action immediately if the Method 9 test indicates opacity exceeding 10 percent.

7.0 Periodic Review and Update of this Operations and Maintenance Plan

The Environmental Manager (or a designated representative) will review this Raw Material Preparation System Operations and Maintenance Plan once per year for adequacy and currency. Documentation of the annual review or update will be retained in Environmental Department files for five years.

8.0 Operations and Maintenance Plan Revision History

<u>Revision</u>	<u>Date</u>	<u>Purpose</u>
1.0	March 2002	Initial plan generation

PC MACT Operations and Maintenance Plan

Pyroprocessing—Kiln System

1.0 Source Description

The Kiln System is used to manufacture cement clinker. Its five main system components are:

- A solid fuel grinding and firing system that processes/crushes coal and petroleum coke in preparation for fueling the kiln. .
- A preheater feed and recirculation system that routes raw materials to the preheater/precalciner tower.
- A preheater/precalciner system that prepares raw materials to be fed to the kiln. The system includes the preheater/precalciner tower.
- A kiln and in-line raw mill dust collection system that removes dust from air leaving the kiln before it reaches the atmosphere, including the kiln/raw mill baghouse, the alkali bypass baghouse, and the raw mill/alkali bypass stack.
- A rotary kiln system that is used to manufacture clinker from preheated and/or precalcined raw materials. The system includes the rotary kiln.

2.0 System Emission Points and Air Pollution Control Equipment

During Kiln System operations, particulate matter are emitted at several emission points. The system includes eight different baghouses to control particulate matter emissions during kiln system operations. The following table summarizes system emission points and applicable air pollution control devices (APCDs), as well as the visual inspection interval (see Section 6.0):

Emission Point #	Description	Air Pollution Control Device	Equipment #	VE Inspection Interval
0466	Dust Collector – Kiln and In-Line Roller Mill	Dust collector baghouse	31046600	NA-COM
0504	Dust Collector – 520 Kiln Feed Level Bin, Airlift, Airslides, 527 Separator	Dust collector baghouse	41050400	Monthly
0535	Dust Collector – Waste Dust Bin	Dust collector baghouse	41053500	Monthly
0574	Dust Collector – Top of CKD Tank	Dust collector baghouse	41057400	Monthly
0594	Dust Collector – Alkali Bypass	Dust collector baghouse	41059400	NA-COM
0667	Dust Collector – Coal Mill Cyclone	Dust collector baghouse	43066700	Monthly
0684	Dust Collector – Coal Silo	Dust collector baghouse	43068400	Monthly

3.0 Applicable Emission Limit

The emission limits applicable to the Kiln System are the following:

- For the kiln/in-line raw mill system (40 CFR 63.1343):

1. Particulate matter emissions must not exceed 0.15 kg/Mg of feed (dry basis);
 2. Visible emissions must not exceed 20 percent opacity; and
 3. Dioxin/furan emissions must be less than 0.40 ng/dscm (TEQ), corrected to 7% oxygen, with a baghouse inlet temperature less than 204°C; or
 4. Dioxin/furan emissions must be less than 0.20 ng/dscm (TEQ, corrected to 7% oxygen, with a baghouse inlet temperature greater than or equal to 204°C.
- For other equipment in the kiln system (40 CFR 63.1348): Visible emissions must not exceed 10 percent opacity.

4.0 Operator Procedures for Minimizing Visible Emissions From the Kiln System During Normal Kiln System Operations

Kiln System operations are performed in accordance with the Lafarge Standard Operating Procedure (SOP) documents for Solid Fuel Grinding and Firing, Preheater Feed and Recirculation, Preheater/Precalciner, Kiln and In-Line Raw Mill Dust Collection, and Rotary Kiln. Applicable SOPs include the following:

- Solid Fuel Grinding—Normal Operation
- Solid Fuel Handling/Loading-Normal Operation
- Preheater Tower—Normal Operation
- Rotary Kiln—Normal Operation

These procedures are part of the plant's electronic operating procedures system, which is maintained and kept current on the plant's network drive (F:/shared/environmental/O&M). The SOPs discuss how the plant shall be operated, and are used for job-specific training. The tasks necessary to ensure proper operation of the Kiln System with minimum emissions are also included within the SOPs.

5.0 Preventive Maintenance

Preventative maintenance work orders are maintained on MAXIMO, the Plant's Windows-based electronic maintenance management system. Sample work orders are included in the appendices. All items on work orders are checked, but not recorded unless values are out of normal operating range. Maintenance Department technicians perform preventative maintenance (PM) tasks on Kiln System and Coal/Coke Handling System equipment, including:

Equipment #	Equipment Description – Function
31044200-31045800	Screw Conveyors 442-448, 452-458 – Dust Collector 466
31046600	Dust Collector – Kiln/In-Line Roller Mill
DAVYT4761	Thermocouple – Kiln/In-Line Roller Mill Dust Collector Inlet
31046700	Exhaust Fan – Dust Collector 466
31046400	Kiln Exhaust Stack
31046410	Gas Sampling – Kiln Exhaust Stack
31046420	O ₂ Analyzer – Kiln Exhaust Stack
31046430	CO Analyzer – Kiln Exhaust Stack
31046440	NO _x & SO ₂ Analyzers – Kiln Exhaust Stack
31046460	Flowmeter – Kiln Exhaust Stack
31046621	Opacity Analyzer – Kiln Exhaust Stack
31046622	CEMS – Kiln Exhaust Stack
41050200	Screw Conveyor – Dust Collector 504
41050300	Exhaust Fan – Dust Collector 504

41050400	Dust Collector – 520 Kiln Feed Level Bin, Airlift, Airslides, 527 Separator
41053500	Dust Collector – Waste Dust Bin
41053600	Exhaust Fan – Dust Collector 535
41057400	Dust Collector – Top of CKD Tank
41058100-41058900, 41059200	Screw Conveyors 581-589, 592 – Dust Collector 594
41059400	Dust Collector – Alkali Bypass
41059401	Thermocouple – Alkali Bypass Dust Collector Inlet
41059500	Exhaust Fan – Dust Collector 594
41063600	Exhaust Fan – Dust Collector 637
41063700	Dust Collector – 610 Fan, Electric Room 2E
43066200	Screw Conveyor – Dust Collector 667
43066600	Exhaust Fan – Dust Collector 667
43066700	Dust Collector – Coal Mill Cyclone
43068300	Exhaust Fan – Dust Collector 684
43068400	Dust Collector – Coal Silo

The Kiln System and Coal/Coke Handling System PM schedules are maintained on MAXIMO. The PM schedules and the PM task lists for equipment in these systems are based upon past experience with similar equipment and the manufacturer's documentation/recommendations.

Maintenance Technicians utilize checklists from the MAXIMO database to conduct PM activities. The checklists include detailed steps and instructions for performance of these activities. Once work completion has been verified, checklist data is entered into MAXIMO. This and other relevant information are periodically archived within the database, establishing a verifiable record of ongoing PM activity completion and providing a method by which to review historical equipment performance.

6.0 Monitoring Requirements

6.1 *Opacity Monitoring Requirements*

The kiln/in-line raw mill and alkali bypass baghouse emissions exit from a single stack (kiln exhaust stack) and are monitored for opacity using a continuous opacity monitor (COM) in accordance with 40 CFR 63.1350(c). The COM is installed, maintained, calibrated, and operated as required by 40 CFR 63, Subpart A and 40 CFR 60 Appendix B PS-1. Opacity is maintained such that the 6-minute average opacity does not exceed 20 percent. (Note: The plant's PSD permit requires it to meet a 10 percent opacity on the kiln exhaust stack.)

6.2 *Periodic Method 22 Visible Emissions Monitoring Requirements*

As referenced in the table in Section 2.0, other parts of the Kiln System, including the CKD silo, kiln feed air lift, and coal mill/solid fuel grinding dust collector baghouses, will be tested for visible emissions once each month using USEPA Method 22 – Visual Determination of Fugitive Emissions from Material Sources and Smoke Emissions from Flares. The Method 22 tests will be conducted by trained observers while the Kiln System is in operation. The Maintenance Manager (or a designated representative) will schedule the Method 22 testing. Copies of the Method 22 procedures, Field Data Worksheets, and equipment needed to conduct the tests (stopwatch, etc.) will be maintained in the Environmental Department.

As noted in the Method 22 procedures, observers will take care to perform the test from the proper location relative to the source and the sun, as well as to avoid degraded visibility of emissions caused by improper background contrast, ambient lighting, and observer position relative to lighting and wind.

During the Method 22 test, the observer should determine the presence or absence of visible emissions at points above or beyond the baghouse exhaust vents and stacks. The duration of the Method 22 tests will be one minute. Upon completion of the test, the observer will record the results on the Method 22 Field Data Worksheet, and submit the worksheet to the Maintenance Manager, who will forward the results to the Environmental Manager (or a designated representative). The Environmental Manager (or a designated representative) will maintain the Method 22 records for a period of five years.

If visible emissions are noted during a monthly Method 22 test, the observer will immediately notify the Environmental Manager (or a designated representative) so that a six-minute Method 9 test can be started within one hour of the initial observation.

Note: If monthly Method 22 tests indicate no visible emissions for six consecutive monthly tests, the test frequency may be reduced to once every six months. If no visible emissions are detected on the next six-month test, the test frequency may be reduced to once per year. Any time visible emissions are detected by these Method 22 tests, monthly testing must be resumed [40 CFR 63.1350(a)(4)(ii) & (iii)].

6.3 Periodic Method 9 Opacity Tests

Whenever visible emissions are observed during a Method 22 test of the Kiln System, an opacity test using the procedures described in USEPA Method 9 – Visual Determination of the Opacity of Emissions from Stationary Sources must be performed to determine if the 10 percent opacity limit is being met. If visible emissions are observed during the one-minute Method 22 test, a six-minute Method 9 test must be conducted within one hour of the initial observation.

The Environmental Manager (or a designated representative) will ensure that trained and certified Method 9 observers are available each day the Method 22 testing is conducted on the Kiln System. Copies of the Method 9 procedures, Field Data Worksheets, and equipment needed to conduct the tests will be maintained in the Environmental Department.

As noted in the Method 9 procedures, observers will take care to perform the test from the proper location relative to the source and the sun, as well as to avoid degraded visibility of emissions caused by improper background contrast, ambient lighting, and observer position relative to lighting and wind.

During the Method 9 test, the observer should determine the opacity of visible emissions plume at points above or beyond the baghouse exhaust vents and stacks. The duration of the Method 9 test will be six minutes. Upon completion of the test, the observer will record the results on the Method 9 Field Data Worksheet, and submit the worksheet to the Environmental Department. The Environmental Manager (or a designated representative) will maintain the Method 9 records for a period of five years.

The observer will notify the Environmental Manager (or a designated representative) and initiate corrective action immediately if the Method 9 test indicates opacity exceeding 10 percent.

7.0 Periodic Review and Update of this Operations and Maintenance Plan

The Environmental Manager (or a designated representative) will review this Kiln System Operations and Maintenance Plan once per year for adequacy and currency. Documentation of the annual review or update will be retained in Environmental Department files for five years.

8.0 Operations and Maintenance Plan Revision History

<u>Revision</u>	<u>Date</u>	<u>Purpose</u>
1.0	March 2002	Initial plan generation

PC MACT Operations and Maintenance Plan Coal/Coke Preparation System

1.0 Source Description

The Coal/Coke Preparation System is used to grind and combine fuel materials prior to firing them into the pyroprocessing systems. Its two main system components are:

- A silo for storing coarse coal and coke material.
- A grinding system that prepares fuel materials for combustion. The system includes the coal mill.

2.0 System Emission Points and Air Pollution Control Equipment

During Coal/Coke Preparation System operations, particulate matter is emitted at several emission points. The system includes two different baghouses to control particulate matter emissions during coal/coke preparation system operations. The following table summarizes system emission points and applicable air pollution control devices (APCDs), as well as the visual inspection interval (see Section 6.0):

Emission Point #	Description	Air Pollution Control Device	Equipment #	VE Inspection Interval
0667	Dust Collector – Coal Mill	Dust Collector Baghouse	43066700	Weekly
0684	Dust Collector – Coal/Coke Silo Vent	Dust Collector Baghouse	43068400	Weekly

3.0 Applicable Emission Limit

The emission limits applicable to the Coal/Coke Preparation System are the following:

- Emission Points 0667 & 0684 have opacity limits of 20%.

4.0 Operator Procedures for Minimizing Visible Emissions From the Raw Material Preparation System During Normal Raw Material Preparation

Coal/Coke Preparation System operations are performed in accordance with the Lafarge Standard Operating Procedure (SOP) documents for Solid Fuel Safety and Operations. Applicable SOPs include the following:

- Coal Mill-Safety and Operations

These procedures are part of the plant's SOP database located in the control room. The SOPs discuss how the plant shall be operated, and are used for job-specific training. The tasks necessary to ensure proper operation of the Fuel Preparation System with minimum emissions are also included within the SOPs.

5.0 Preventive Maintenance

Preventative maintenance work orders are maintained on MAXIMO, the Plant's Windows-based electronic maintenance management system. Sample work orders are included in the appendices.

All items on work orders are checked, but not recorded unless values are out of normal operating range. Maintenance Department technicians perform preventative maintenance (PM) tasks on the Coal/Coke Preparation System equipment, including:

Equipment #	Equipment Description – Function
43066600	666 DC Exhaust Fan-Dust Collector 667
43066200	662 Screw conveyor-Dust Collector 667
43068201	68201-Rotary Air Locks-Dust Collector 667
43066300	663- Rotary Air Locks-Dust Collector 667
43066400	664- Rotary Air Locks-Dust Collector 667
43066500	665- Rotary Air Locks-Dust Collector 667
43068700	687-Belt Conveyor
43068300	683 Exhaust Fan-Dust Collector 684
43066700	667 Dust Collector
43068400	684 Dust Collector

The Coal/Coke Preparation System PM schedule is maintained on MAXIMO. The PM schedules and the PM task lists for equipment in the Coal/Coke Preparation System are based upon past experience with similar equipment and the manufacturer's documentation/recommendations.

Maintenance Technicians utilize checklists from the MAXIMO database to conduct PM activities. The checklists include detailed steps and instructions for performance of these activities. Once work completion has been verified, checklist data is entered into MAXIMO. This and other relevant information are periodically archived within the database, establishing a verifiable record of ongoing PM activity completion and providing a method by which to review historical equipment performance.

6.0 Monitoring Requirements

6.1 Periodic Method 22 Visible Emissions Monitoring Requirements

As referenced in the table in Section 2.0, the coal mill and coal/coke silo will be tested for visible emissions once each week using USEPA Method 22 – Visual Determination of Fugitive Emissions from Material Sources and Smoke Emissions from Flares. Trained observers will conduct the Method 22 tests while the Coal/Coke Preparation System is in operation. The Maintenance Manager (or a designated representative) will schedule the Method 22 testing. Copies of the Method 22 procedures, Field Data Worksheets, and equipment needed to conduct the tests (stopwatch, etc.) will be maintained in the Environmental Department.

As noted in the Method 22 procedures, observers will take care to perform the test from the proper location relative to the source and the sun, as well as to avoid degraded visibility of emissions caused by improper background contrast, ambient lighting, and observer position relative to lighting and wind.

During the Method 22 test, the observer should determine the presence or absence of visible emissions at points above or beyond the baghouse exhaust vents and stacks. The duration of the Method 22 tests will be one minute. Upon completion of the test, the observer will

record the results on the Method 22 Field Data Worksheet, and submit the worksheet to the Maintenance Manager, who will forward the results to the Environmental Manager (or a designated representative). The Environmental Manager (or a designated representative) will maintain the Method 22 records for a period of five years.

If visible emissions are noted during a monthly Method 22 test, the observer will immediately notify the Environmental Manager (or a designated representative) so that a six-minute Method 9 test can be started within one hour of the initial observation.

7.0 Periodic Review and Update of this Operations and Maintenance Plan

The Environmental Manager (or a designated representative) will review this Coal/Coke Preparation System Operations and Maintenance Plan once per year for adequacy and currency. Documentation of the annual review or update will be retained in Environmental Department files for five years.

8.0 Operations and Maintenance Plan Revision History

<u>RevisionDate</u>	<u>Purpose</u>
1.0September 2004	Initial plan generation

PC MACT Operations and Maintenance Plan

Pyroprocessing—Clinker Cooler System

1.0 Source Description

The Clinker Cooler System is used to cool clinker produced by the kiln and prepare the clinker for storage and processing. Its three main system components are:

- A clinker cooler system that receives clinker from the kiln and blows air across it, including the clinker cooler, the clinker cooler fans, and the clinker chutes.
- A clinker handling and storage system that moves clinker from the clinker cooler to the clinker silos in preparation for further processing or handling. The system includes drag chains, a bucket elevator, and the clinker silos.
- A clinker cooler dust collection system that removes dust from air leaving the clinker cooler before it reaches the atmosphere, including cooling fans, the clinker cooler baghouse, and the clinker cooler stack.

2.0 System Emission Points and Air Pollution Control Equipment

During Clinker Cooler System operations, particulate matter are emitted at three emission points. The system includes one main baghouse and two dust collector baghouses to control particulate matter emissions at the clinker cooler, the clinker silo, and the clinker elevator. The following table summarizes system emission points and applicable air pollution control devices (APCDs), as well as the visual inspection interval (See Section 6.0):

Emission Point #	Description	Air Pollution Control Device	Equipment #	VE Inspection Interval
0611	Dust Collector – Clinker Cooler Ductwork	Dust collector baghouse	41061100	N/A—COM
0709	Dust Collector – Clinker/ Gypsum 712 Drag Conveyor	Dust collector baghouse	41070900	Monthly
0743	Dust Collector – Clinker/ Gypsum Storage Silos	Dust collector baghouse	41074300	Monthly

3.0 Applicable Emission Limit

The emission limit applicable to the Clinker Cooler System is particulate emissions must not exceed 0.050 kg/Mg of feed (dry basis), and visible emissions must not exceed 10 percent opacity (40 CFR 63.1345 and 63.1348).

4.0 Operator Procedures for Minimizing Visible Emissions From the Clinker Cooler System During Normal Clinker Cooler System Operations

Clinker Cooler System operations are performed in accordance with the Lafarge Standard Operating Procedure (SOP) documents for Clinker Cooler, Clinker Handling and Storage, and Clinker Cooler Dust Collection. Applicable SOPs include the following:

- Clinker Cooler—Normal Operation
- Clinker Handling—Normal Operation

These procedures are part of the plant's electronic operating procedures system, which is maintained and kept current on the plant's network drive (F:/shared/environmental/O&M). The SOPs discuss how the plant shall be operated, and are used for job-specific training. The tasks necessary to ensure proper operation of the Clinker Cooler System with minimum emissions are also included within the SOPs.

5.0 Preventive Maintenance

Preventative maintenance work orders are maintained on MAXIMO, the Plant's Windows-based electronic maintenance management system. Sample work orders are included in the appendices. All items on work orders are checked, but not recorded unless values are out of normal operating range. Maintenance Department technicians perform preventative maintenance (PM) tasks on the Clinker Handling System equipment, including:

Equipment #	Equipment Description - Function
41061000	Exhaust Fan – Dust Collector 611
41061100	Dust Collector – Clinker Cooler Ductwork
41061121	Opacity Analyzer – Clinker Cooler Exhaust Stack
410611A1, B1, C1, D1	Thermocouples – Dust Collector 611
41077400, 41077601, 41077602, 41077700-41078000	Screw Conveyors – Dust Collector 611
41070800	Exhaust Fan – Dust Collector 709
41070900	Dust Collector – Clinker/Gypsum 712 Drag Conveyor
41072300-41072700, 41073200	Dust Collectors – Clinker Tunnel
41074200	Exhaust Fan – Dust Collector 743
41074300	Dust Collector – Clinker/Gypsum Storage Silos

The Clinker Handling System PM schedule is maintained on MAXIMO. The PM schedules and the PM task lists for equipment in these systems are based upon past experience with similar equipment and the manufacturer's documentation/recommendations.

Maintenance Technicians utilize checklists from the MAXIMO database to conduct PM activities. The checklists include detailed steps and instructions for performance of these activities. Once work completion has been verified, checklist data is entered into MAXIMO. This and other relevant information are periodically archived within the database, establishing a verifiable record of ongoing PM activity completion and providing a method by which to review historical equipment performance.

6.0 Monitoring Requirements

6.1 *Opacity Monitoring Requirements*

The Clinker Cooler baghouse emissions are monitored for opacity using a continuous opacity monitor (COM) in accordance with 40 CFR 63.1350(d). The COM is installed, maintained, calibrated, and operated as required by 40 CFR 63, Subpart A and 40 CFR 60 Appendix B PS-1. Opacity is maintained such that the 6-minute average opacity does not exceed 10 percent.

6.2 *Periodic Method 22 Visible Emissions Monitoring Requirements*

As referenced in the table in Section 2.0, other parts of the Clinker Cooler System, including the clinker elevator and clinker silo dust collector baghouses, will be tested for visible emissions once each month using USEPA Method 22 – Visual Determination of Fugitive Emissions from Material Sources and Smoke Emissions from Flares. The Method 22 tests will be conducted by trained observers while the Clinker Cooler System is in operation. The Maintenance Manager (or a designated representative) will schedule the Method 22 testing. Copies of the Method 22 procedures, Field Data Worksheets, and equipment needed to conduct the tests (stopwatch, etc.) will be maintained in the Environmental Department.

As noted in the Method 22 procedures, observers will take care to perform the test from the proper location relative to the source and the sun, as well as to avoid degraded visibility of emissions caused by improper background contrast, ambient lighting, and observer position relative to lighting and wind.

During the Method 22 test, the observer should determine the presence or absence of visible emissions at points above or beyond the baghouse exhaust vents and stacks. The duration of the Method 22 tests will be one minute. Upon completion of the test, the observer will record the results on the Method 22 Field Data Worksheet, and submit the worksheet to the Maintenance Manager, who will forward the results to the Environmental Manager (or a designated representative). The Environmental Manager (or a designated representative) will maintain the Method 22 records for a period of five years.

If visible emissions are noted during a monthly Method 22 test, the observer will immediately notify the Environmental Manager (or a designated representative) so that a six-minute Method 9 test can be started within one hour of the initial observation.

Note: If monthly Method 22 tests indicate no visible emissions for six consecutive monthly tests, the test frequency may be reduced to once every six months. If no visible emissions are detected on the next six-month test, the test frequency may be reduced to once per year. Any time visible emissions are detected by these Method 22 tests, monthly testing must be resumed [40 CFR 63.1350(a)(4)(ii) & (iii)].

6.3 *Periodic Method 9 Opacity Tests*

Whenever visible emissions are observed during a Method 22 test of the Clinker Cooler System, an opacity test using the procedures described in USEPA Method 9 – Visual Determination of the Opacity of Emissions from Stationary Sources must be performed to determine if the 10 percent opacity limit is being met. If visible emissions are observed during the one-minute Method 22 test, a six-minute Method 9 test must be conducted within one hour of the initial observation.

The Environmental Manager (or a designated representative) will ensure that trained and certified Method 9 observers are available each day the Method 22 testing is conducted on the Clinker Cooler System. Copies of the Method 9 procedures, Field Data Worksheets, and equipment needed to conduct the tests will be maintained in the Environmental Department.

As noted in the Method 9 procedures, observers will take care to perform the test from the proper location relative to the source and the sun, as well as to avoid degraded visibility of emissions caused by improper background contrast, ambient lighting, and observer position relative to lighting and wind.

During the Method 9 test, the observer should determine the opacity of visible emissions plume at points above or beyond the baghouse exhaust vents and stacks. The duration of the Method 9 test will be six minutes. Upon completion of the test, the observer will record the results on the Method 9 Field Data Worksheet, and submit the worksheet to the Environmental Department. The Environmental Manager (or a designated representative) will maintain the Method 9 records for a period of five years.

The observer will notify the Environmental Manager (or a designated representative) and initiate corrective action immediately if the Method 9 test indicates opacity exceeding 10 percent.

7.0 Periodic Review and Update of this Operations and Maintenance Plan

The Environmental Manager will review this Clinker Cooler System Operations and Maintenance Plan once per year for adequacy and currency. Documentation of the annual review or update will be retained in Environmental Department files for five years.

8.0 Operations and Maintenance Plan Revision History

<u>Revision</u>	<u>Date</u>	<u>Purpose</u>
1.0	March 2002	Initial plan generation

PC MACT Operations and Maintenance Plan

Cement Production System

1.0 Source Description

The Cement Production System is used to process clinker and gypsum into finished cement products ready for sale and shipping. Its three main system components are:

- A finish grinding system that processes/crushes clinker, including the gypsum and clinker weigh feeders, the finish mill conveyor, the finish mill, the grinding aid distribution system, the finish mill elevator, the separator, and the cement cooler.
- A cement transport system that routes finished cement to the appropriate storage locations, including the conveyor belts to the overtrack silos and AE silos.
- A gypsum/clinker handling and storage system that is used to supply gypsum and clinker for finish milling of cement. The system includes the gypsum truck unloading, the gypsum reclaim loading hopper, the gypsum storage silos, and the gypsum/clinker reclaim conveyors.

2.0 System Emission Points and Air Pollution Control Equipment

During Cement Production System operations, particulate matter are emitted at several emission points. The system includes ten different baghouses to control particulate matter emissions during cement finish mill operations, cement transfer and storage operations, and gypsum handling and storage operations. The following table summarizes system emission points and applicable air pollution control devices (APCDs), as well as the visual inspection interval (see Section 6.0):

Emission Point #	Description	Air Pollution Control Device	Equipment #	VE Inspection Interval
0709	Dust Collector – Clinker/Gypsum 712 Drag Conveyor	Dust Collector Baghouse	41070900	Monthly
0743	Dust Collector – Clinker/ Gypsum Storage Silos	Dust Collector Baghouse	41074300	Monthly
0811	Dust Collector – Surge Bins, Pumps	Dust Collector Baghouse	52081100	Monthly
0817	Dust Collector – Finish Mill	Dust Collector Baghouse	52081700	Daily
0822	Dust Collector – Finish Mill Air Separator	Dust Collector Baghouse	52082200	Daily
0826	Dust Collector – Finish Mill Feed Belt 862	Dust Collector Baghouse	52082600	Monthly
0956	Dust Collector – East & West River Silos	Dust Collector Baghouse	65095600	Monthly
1007	Dust Collector – AE Silos	Dust Collector Baghouse	65100700	Monthly
1016	Dust Collector – Cone Bottom Silos	Dust Collector Baghouse	65101600	Monthly
1053	Dust Collector – Overtrack Silos	Dust Collector Baghouse	65105300	Monthly

3.0 Applicable Emission Limit

The emission limit applicable to the Cement Production System is visible emissions that must not exceed 10 percent opacity (40 CFR 63.1347 and 63.1348).

4.0 Operator Procedures for Minimizing Visible Emissions From the Cement Production System During Normal Cement Production System Operations

Cement Production System operations are performed in accordance with the Lafarge Standard Operating Procedure (SOP) documents for Finish Grinding, Cement Transport, and Gypsum Handling & Storage. Applicable SOPs include the following:

- 52-MID-01 PD Finish Mill—Normal Operation

These procedures are part of the plant's electronic operating procedures system, which is maintained and kept current on the plant's network drive (F:/shared/environmental/O&M). The SOPs discuss how the plant shall be operated, and are used for job-specific training.

5.0 Preventive Maintenance

Preventative maintenance work orders are maintained on MAXIMO, the Plant's Windows-based electronic maintenance management system. Sample work orders are included in the appendices. All items on work orders are checked, but not recorded unless values are out of normal operating range. Maintenance Department technicians perform preventative maintenance (PM) tasks on the Cement Production System equipment, including:

Equipment #	Equipment Description - Function
41076500	Gypsum Reclaim Loading Hopper
41070800	Exhaust Fan – Dust Collector 709
41070900	Dust Collector – Clinker/Gypsum 712 Drag Conveyor
41074200	Exhaust Fan – Dust Collector 743
41074300	Dust Collector – Clinker/Gypsum Storage Silos
52081100	Dust Collector – Surge Bins, Pumps
52081200	Exhaust Fan – Dust Collector 811
52081700	Dust Collector – Finish Mill
52081701	Thermocouple– Dust Collector 817 Inlet
52081800	Exhaust Fan – Dust Collector 817
52082500	Screw Conveyor – Dust Collector 817
52082000	Screw Conveyor – Dust Collector 822
52082100	Exhaust Fan – Dust Collector 822
52082200	Dust Collector – Finish Mill Air Separator
52082600	Dust Collector – Finish Mill Feed Belt 862
52082700	Exhaust Fan – Dust Collector 826
52088900	Dust Collector – Feed End of 905 Belt
52089000	Exhaust Fan – Dust Collector 889
65090600	Dust Collector – Discharge of 905 Belt
65090700	Exhaust Fan – Dust Collector 906
65092600	Dust Collector – Discharge of 914 Belt
65092700	Exhaust Fan – Dust Collector 926

65095600	Dust Collector – East & West River Silos
65095700	Exhaust Fan – Dust Collector 956
65100600	Exhaust Fan – Dust Collector 1007
65100700	Dust Collector – AE Silos
65101600	Dust Collector – Cone Bottom Silos
65105200	Exhaust Fan – Dust Collector 1053
65105300	Dust Collector – Overtrack Silos

The Cement Production System PM schedule is maintained on MAXIMO. The PM schedules and the PM task lists for equipment in these systems are based upon past experience with similar equipment and the manufacturer's documentation/recommendations.

Maintenance Technicians utilize checklists from the MAXIMO database to conduct PM activities. The checklists include detailed steps and instructions for performance of these activities. Once work completion has been verified, checklist data is entered into MAXIMO. This and other relevant information are periodically archived within the database, establishing a verifiable record of ongoing PM activity completion and providing a method by which to review historical equipment performance.

6.0 Monitoring Requirements

6.1 *Periodic Method 22 Visible Emissions Monitoring Requirements*

The finish mill portion of the Cement Production System must be tested for visible emissions once each day using the procedures described in USEPA Method 22 – Visual Determination of Fugitive Emissions from Material Sources and Smoke Emissions from Flares. Other parts of the Cement Production System, including the cement transport system, will be tested for visible emissions using Method 22 once each month. (See the table in Section 2.0 for a summary of the testing frequency required for each emission point). The Method 22 tests will be conducted by trained observers while the Cement Production System is in operation. The Maintenance Manager (or a designated representative) will schedule the Method 22 testing. Copies of the Method 22 procedures, Field Data Worksheets, and equipment needed to conduct the tests (stopwatch, etc.) will be maintained in the Environmental Department.

As noted in the Method 22 procedures, observers will take care to perform the test from the proper location relative to the source and the sun, as well as to avoid degraded visibility of emissions caused by improper background contrast, ambient lighting, and observer position relative to lighting and wind.

During the Method 22 test, the observer should determine the presence or absence of visible emissions at points above or beyond the baghouse exhaust vents and stacks and the stilling shed covering, as applicable. The duration of the daily Method 22 tests will be six minutes; the monthly Method 22 tests will last one minute. Upon completion of the daily test, the observer will record the results on the Method 22 Field Data Worksheet, and submit the worksheet to the Production Manager, who will forward the results to the Environmental Manager (or a designated representative). Upon completion of the monthly tests, the observer will record the result on the Method 22 Field Data Worksheet, and submit the worksheet to the Maintenance Manager who will forward the results to the Environmental Manager (or a designated representative). The Environmental Manager (or a designated representative) will maintain the Method 22 records for a period of five years.

If visible emissions are noted during a daily Method 22 test, maintenance will be notified and corrective actions taken within one hour by submitting a maintenance work order request to the MAXIMO maintenance

control system. A follow-up six-minute Method 22 test of the stack will be conducted within 24 hours of the initial observation. If visible emissions are noted during the follow-up test, the observer will immediately notify the Environmental Manager (or a designated representative) so that a 30-minute Method 9 test can be started within 24 hours of the second Method 22 observation. The observer will again initiate proper corrective actions within one hour by submitting a maintenance work order request to the MAXIMO maintenance control system.

If visible emissions are noted during a monthly Method 22 test, the observer will immediately notify the Environmental Manager (or a designated representative) so that a six-minute Method 9 test can be started within one hour of the initial observation.

Note: If monthly Method 22 tests indicate no visible emissions for six consecutive monthly tests, the test frequency may be reduced to once every six months. If no visible emissions are detected on the next six-month test, the test frequency may be reduced to once per year. Any time visible emissions are detected by these Method 22 tests, monthly testing must be resumed [40 CFR 63.1350(a)(4)(ii) & (iii)]. This provision to reduce testing frequencies does not apply to daily Method 22 tests required for the finish mill.

6.2 *Periodic Method 9 Opacity Tests*

Whenever visible emissions are observed during a monthly or follow-up daily Method 22 test of the Cement Production System, an opacity test using the procedures described in USEPA Method 9 – Visual Determination of the Opacity of Emissions from Stationary Sources must be performed to determine if the 10 percent opacity limit is being met. If visible emissions are observed during a follow-up daily 6-minute Method 22 test, a 30-minute Method 9 test must be conducted within 24 hours of the follow-up observation; if visible emissions are observed during a monthly (or less frequent) one-minute Method 22 test, a six-minute Method 9 test must be conducted within one hour of the initial observation.

The Environmental Manager (or a designated representative) will ensure that trained and certified Method 9 observers are available each day the Cement Production System is in operation. Copies of the Method 9 procedures, Field Data Worksheets, and equipment needed to conduct the tests will be maintained in the Environmental Department.

As noted in the Method 9 procedures, observers will take care to perform the test from the proper location relative to the source and the sun, as well as to avoid degraded visibility of emissions caused by improper background contrast, ambient lighting, and observer position relative to lighting and wind.

During the Method 9 test, the observer should determine the opacity of visible emissions plume at points above or beyond the baghouse exhaust vents and stacks and the stilling shed covering, as applicable. The duration of the Method 9 test will be either thirty minutes (after a follow-up daily Method 22 test of the finish mill) or six minutes (following a monthly Method 22 test of other parts of the system). Upon completion of the test, the observer will record the results on the Method 9 Field Data Worksheet, and submit the worksheet to the Environmental Department. The Environmental Manager (or a designated representative) will maintain the Method 9 records for a period of five years.

The observer will notify the Environmental Manager (or a designated representative) and initiate corrective action immediately if the Method 9 test indicates opacity exceeding 10 percent.

7.0 Periodic Review and Update of this Operations and Maintenance Plan

The Environmental Manager (or a designated representative) will review this Cement ProductionSystem Operations and Maintenance Plan once per year for adequacy and currency. Documentation of the annual review or update will be retained in Environmental Department files for five years.

8.0 Operations and Maintenance Plan Revision History

Revision	Date	Purpose
1.0	March 2002	Initial plan generation

PC MACT Operations and Maintenance Plan

Cement Shipping System

1.0 Source Description

The Cement Shipping System is used to store finished cement products ready for sale and load the products for shipping. Its main system component is:

- A cement storage and bulk loading system that stores finished cement products and loads them for shipping, including the cement truck loadout chutes, railcar loadout chutes, and the barge loading silo and chute. (What about pneumatic pumps for barge systems, cement drag conveyors and elevators to go between the silos and the loadout systems?)

2.0 System Emission Points and Air Pollution Control Equipment

During Cement Shipping System operations, particulate matter are emitted at four emission points. The system includes four different dust collector baghouses to control particulate matter emissions at the truck and rail loadout chutes. The following table summarizes system emission points and applicable air pollution control devices (APCDs), as well as the visual inspection interval (see Section 6.0):

Emission Point #	Description	Air Pollution Control Device	Equipment #	VE Inspection Interval
1041	Dust Collector – East Rail Scale	Dust Collector Baghouse	65104100	Monthly
1044	Dust Collector – North Truck Scale	Dust Collector Baghouse	65104400	Monthly
1045	Dust Collector – South Truck Scale	Dust Collector Baghouse	65104500	Monthly
1047	Dust Collector – West Rail Scale	Dust Collector Baghouse	65104700	Monthly

3.0 Applicable Emission Limit

The emission limit applicable to the Cement Shipping System is visible emissions must not exceed 10 percent opacity (40 CFR 63.1348).

4.0 Operator Procedures for Minimizing Visible Emissions From the Cement Shipping System During Normal Cement Shipping Operations

Cement Shipping System operations are performed in accordance with the Lafarge Standard Operating Procedure (SOP) documents for (Cement Storage and Bulk Loading System). Applicable SOPs include the following:

- Truck Loading—Normal Operation
- Rail Loading—Normal Operation
- Barge Loading—Normal Operation

These procedures are part of the plant's electronic operating procedures system, which is maintained and kept current on the plant's network drive (F:/shared/environmental/O&M). The SOPs discuss how the plant shall be operated, and are used for job-specific training. The tasks necessary to ensure proper operation of the Cement Shipping System with minimum emissions are also included within the SOPs.

5.0 Preventive Maintenance

Preventative maintenance work orders are maintained on MAXIMO, the Plant's Windows-based electronic maintenance management system. Sample work orders are included in the appendices. All items on work orders are checked, but not recorded unless values are out of normal operating range. Maintenance Department technicians perform preventative maintenance (PM) tasks on the Cement Shipping System equipment, including:

Equipment #	Equipment Description - Function
65104100	Dust Collector – East Rail Scale
65104400	Dust Collector – North Truck Scale
65104500	Dust Collector – South Truck Scale
65104700	Dust Collector – West Rail Scale

The Cement Shipping System PM schedule is maintained on MAXIMO. The PM schedules and the PM task lists for equipment in these systems are based upon past experience with similar equipment and the manufacturer's documentation/recommendations.

Maintenance Technicians utilize checklists from the MAXIMO database to conduct PM activities. The checklists include detailed steps and instructions for performance of these activities. Once work completion has been verified, checklist data is entered into MAXIMO. This and other relevant information are periodically archived within the database, establishing a verifiable record of ongoing PM activity completion and providing a method by which to review historical equipment performance.

6.0 Monitoring Requirements

6.1 *Periodic Method 22 Visible Emissions Monitoring Requirements*

As referenced in the table in Section 2.0, the Cement Shipping System must be tested for visible emissions once each month using the procedures described in USEPA Method 22 – Visual Determination of Fugitive Emissions from Material Sources and Smoke Emissions from Flares. The Method 22 tests will be conducted by trained observers while the Cement Shipping System is in operation. The Maintenance Manager (or a designated representative) will schedule the Method 22 testing. Copies of the Method 22 procedures, Field Data Worksheets, and equipment needed to conduct the tests (stopwatch, etc.) will be maintained in the Environmental Department.

As noted in the Method 22 procedures, observers will take care to perform the test from the proper location relative to the source and the sun, as well as to avoid degraded visibility of emissions caused by improper background contrast, ambient lighting, and observer position relative to lighting and wind.

During the Method 22 test, the observer should determine the presence or absence of visible emissions at points above or beyond the baghouse exhaust vents and stacks. The duration of the Method 22 tests will be one minute. Upon completion of the test, the observer will record the results on the Method 22 Field Data Worksheet, and submit the worksheet to the Maintenance Manager, who will forward the results to the

Environmental Manager (or a designated representative). The Environmental Manager (or a designated representative) will maintain the Method 22 records for a period of five years.

If visible emissions are noted during a monthly Method 22 test, the observer will immediately notify the Environmental Manager (or a designated representative) so that a six-minute Method 9 test can be started within one hour of the initial observation.

Note: If monthly Method 22 tests indicate no visible emissions for six consecutive monthly tests, the test frequency may be reduced to once every six months. If no visible emissions are detected on the next six-month test, the test frequency may be reduced to once per year. Any time visible emissions are detected by these Method 22 tests, monthly testing must be resumed [40 CFR 63.1350(a)(4)(ii) & (iii)].

6.2 Periodic Method 9 Opacity Tests

Whenever visible emissions are observed during a Method 22 test of the Cement Shipping System, an opacity test using the procedures described in USEPA Method 9 – Visual Determination of the Opacity of Emissions from Stationary Sources must be performed to determine if the 10 percent opacity limit is being met. If visible emissions are observed during the one-minute Method 22 test, a six-minute Method 9 test must be conducted within one hour.

The Environmental Manager (or a designated representative) will ensure that trained and certified Method 9 observers are available each day the Method 22 testing is conducted on the Cement Shipping System. Copies of the Method 9 procedures, Field Data Worksheets, and equipment needed to conduct the tests will be maintained in the Environmental Department.

As noted in the Method 9 procedures, observers will take care to perform the test from the proper location relative to the source and the sun, as well as to avoid degraded visibility of emissions caused by improper background contrast, ambient lighting, and observer position relative to lighting and wind.

During the Method 9 test, the observer should determine the opacity of visible emissions plume at points above or beyond the baghouse exhaust vents and stacks. The duration of the Method 9 test will be six minutes. Upon completion of the test, the observer will record the results on the Method 9 Field Data Worksheet, and submit the worksheet to the Environmental Department. The Environmental Manager (or a designated representative) will maintain the Method 9 records for a period of five years.

The observer will notify the Environmental Manager (or a designated representative) and initiate corrective action immediately if the Method 9 test indicates opacity exceeding 10 percent.

7.0 Periodic Review and Update of this Operations and Maintenance Plan

The Environmental Manager (or a designated representative) will review this Cement Shipping System Operations and Maintenance Plan once per year for adequacy and currency. Documentation of the annual review or update will be retained in Environmental Department files for five years.

8.0 Operations and Maintenance Plan Revision History

Revision	Date	Purpose
1.0	March 2002	Initial plan generation

7.0 Combustion Source Inspections

The main combustion source (burner pipe) in our operation is inspected on an annual basis during winter turnaround by the Production Manager (or designated representative) as well as representatives from the Maintenance Department.

The Production Manager (or designated representative) performs a thorough visual inspection for refractory damage and for damage or wear and tear on the tip of the burner pipe. Additional measures include inspecting for gaping holes and for even wear of metal around the tip. Devices called standoffs center the burner pipe. These standoffs are inspected to ensure the burner pipe is centered. A component known as the swirl channel is inspected for the wear pattern. In addition, a 6-inch metal washer is inspected closely for signs of wear and tear. Refractory located behind this metal washer is also inspected for signs of wear.

The Maintenance Department also performs a visual inspection of the burner pipe and its components. The main focus of their inspection includes the burner tip, castable and the area inside the pipe where the coal is injected. If the tip of the nozzle is found to be burned, then the pipe is pulled out of service and replaced by a spare burner pipe that is kept on our plant site. The pipe taken out of service is sent for repair work on the castable and components. New parts are installed and the burner pipe is re-built for future use. Spare parts are kept on stock just for re-building of the burner pipe. Maintenance will also inspect the flame itself for signs of distortion. In addition, they will perform UT (Ultrasonic Testing) to check the thickness on the wear area where coal is injected.

Appendix C: Applicable Limits and Requirements From 40 CFR 63 § LLL

Applicable Limits and Requirements From 40 CFR 63 Subpart LLL-National Emission Standards for Hazardous Air Pollutants From the Portland Cement Manufacturing Industry,

Compliance date

The compliance date for Lafarge North America Inc. is June 14, 2002.

40 CFR 63.1351(a)

Applicability and designation of affected facility

(a) The affected sources subject to this subpart are:

- (1) Each kiln and in-line kiln/raw mill.
- (2) Each clinker cooler.
- (3) Each raw mill.
- (4) Each finish mill.
- (5) Each raw material dryer.
- (6) Each raw material, clinker, or finished product storage bin.
- (7) Each conveying system transfer point.
- (8) Each bagging system.
- (9) Each bulk loading or unloading system.

(b) The first affected source in the sequence of materials handling operations subject to this subpart is the raw material storage, which is just prior to the raw mill.

The primary and secondary crushers and any other equipment of the on-site nonmetallic mineral processing plant which precedes the raw material storage are not subject to this subpart. Furthermore, the first conveyor transfer point subject to this subpart is the transfer point associated with the conveyor transferring material from the raw material storage to the raw mill, emission unit 0400-1-F.

40 CFR 63.1340

Emission Standards and Operating Limits

Standards for kilns and in-line kiln/raw mills.

(a) The permittee shall not cause to be discharged into the atmosphere from any kiln or in-line kiln/raw mill (including any associated alkali bypass) any gases which:

- (1) Contain particulate matter in excess of 0.15 kg per metric ton (0.30 lb. per ton) of feed (dry basis) to the kiln.
- (2) Exhibit greater than 20 percent opacity (reduced to 10% by Iowa DNR Construction Permit 99-A-579-P1).
- (3) Contain D/F (tetra-, penta-, hexa-, hepta-, and octa-chlorinated dibenzo dioxins and furans) in excess of:
 - (i) 0.20 ng per dscm (8.7E-11 gr per dscf) (TEQ) corrected to seven percent oxygen:
or
 - (ii) 0.40 ng per dscm (1.7E-10 gr per dscf) (TEQ) corrected to seven percent oxygen, when the average of the performance test run average temperatures at the inlet to particulate matter control device is 204 °C (400 °F) or less.

40 CFR 63.1343(b)

Operating limits for kilns and in-line kiln/raw mills

- (a) The permittee must operate the in-line kiln/raw mill such that:
- (1) When the raw mill of the in-line kiln/raw mill is operating, the applicable temperature limit for the main in-line kiln/raw mill exhaust, specified in paragraph (b) of this section and established during the performance test when the raw mill was operating is not exceeded.
 - (2) When the raw mill of the in-line kiln/raw mill is not operating, the applicable temperature limit for the main in-line kiln/raw mill exhaust, specified in paragraph (b) of this section and established during the performance test, with or without the raw mill operating, operating is not exceeded.
 - (3) The applicable temperature for the alkali bypass, specified in paragraph (b) of this section and established during the performance test when the raw mill was operating is not exceeded.
- (b) The temperature limit for affected sources meeting the limits of paragraphs (a)(1) through (a)(3) of this section is determined in accordance with **paragraph (b)(3)(iv) of Performance testing requirements.**
40 CFR 63.1344

Standards for clinker coolers

- (a) The permittee shall not cause to be discharged into the atmosphere from any clinker cooler any gases which:
- (1) contain particulate matter in excess of 0.050 kg per Mg (0.10 lb per ton) of feed (dry basis) to the kiln.
 - (2) exhibit opacity greater than ten (10) percent.
- 40 CFR 63.1345*

Standards for new and reconstructed raw material dryers

The permittee shall not cause to be discharged into the atmosphere from any new or reconstructed raw material dryer any gases which exhibit opacity greater than ten (10) percent.
40 CFR 63.1346

Standards for raw and finish mills

The permittee shall not cause to be discharged into the atmosphere from the mill sweep or air separator air pollution control devices of any raw or finish mill any gases which exhibit opacity greater than ten (10) percent.
40 CFR 63.1347

Standards for affected sources other than kilns; in-line kiln/raw mills; clinker coolers; new and reconstructed raw material dryers; and raw and finish mills

The permittee shall not cause to be discharged into the atmosphere from any new or existing raw material, clinker, or finished product storage bin; conveying system transfer point; bagging system; or any existing raw material dryer any gases which exhibit opacity in excess of ten percent.
40 CFR 63.1348

Monitoring and Compliance Provisions

Performance testing requirements

(a) The owner or operator shall demonstrate initial compliance with the above listed emission limits using the test methods and procedures in paragraph (b) of this section and 40 CFR 63.7. Performance tests shall be documented in complete test reports that contain the information required by paragraphs (a)(1) through (a)(10) of this section, as well as other relevant information. The plan to be followed during testing shall be made available to the Administrator prior to testing, if requested.

- (1) A brief description of the process and the air pollution control system;
- (2) Sampling location description(s);
- (3) A description of sampling and analytical procedures and any modifications to standard procedures;
- (4) Test results;
- (5) Quality assurance procedures and results;
- (6) Records of operating conditions during the test, preparation of standards, and calibration procedures;
- (7) Raw data sheets for field sampling and field and laboratory analyses;
- (8) Documentation of calculations;
- (9) All data recorded and used to establish parameters for compliance monitoring; and
- (10) Any other information required by the test method.

(b) Performance tests to demonstrate compliance with this subpart shall be conducted as specified in paragraphs (1) to (4) of this section.

(1) The permittee shall demonstrate initial compliance for in-line kiln/raw mill particulate matter emissions by conducting separate performance tests as specified in paragraphs (b)(1)(i) to (b)(1)(iii) of this section while the raw mill of the in-line kiln/raw mill is under normal operating conditions and while the raw mill of the in-line kiln/raw mill is not operating. The permittee shall demonstrate initial compliance for clinker cooler particulate matter emissions by conducting a performance test as specified in paragraphs (b)(1)(i) to (b)(1)(iii) of this section. The opacity exhibited during the period of the Method 5 of Appendix A CFR Part 60 performance tests required by paragraph (b)(1)(i) of this section shall be determined as required in paragraphs (b)(1)(i) through (iv) of this section.

(i) EPA Method 5 of Appendix A CFR Part 60 shall be used to determine Particulate Matter (PM) emissions. Each performance test shall consist of three separate runs under the conditions that exist when the affected source is operating at the highest load or capacity level reasonably expected to occur. Each run shall be conducted for at least one hour, and the minimum sample volume shall be 0.85 dscm (30 dscf). The average of the three runs shall be used to determine compliance.

(ii) Suitable methods shall be used to determine the in-line kiln/raw mill feed rate, except for fuels, for each run.

(iii) The emission rate, E, of PM shall be computed for each run using:

$$E = (C_s Q_{sd}) / P$$

Where:

E = emission rate of particulate matter, kg/Mg of kiln feed.

C_s = concentration of PM, kg/dscm.

Q_{sd} = volumetric flow rate of effluent gas, dscm/hr.

P = total kiln feed (dry basis), Mg/hr.

- (iv) The opacity exhibited during the Method 5 test required by (b) (1)(i) above shall be determined through the use of a continuous opacity monitor (COM). The maximum six-minute average opacity during the three Method 5 test runs shall be determined during each Method 5 test run and used to demonstrate initial compliance with the applicable opacity limits of the kiln/raw mill.
- (2) The owner or operator of any affected sources subject to limitations on opacity under this subpart that is not subject to (b)(1) of this section shall demonstrate initial compliance with the affected source opacity limit by conducting a test in accordance Method 9 of Appendix A CFR Part 60. The performance test shall be conducted under the conditions that exist when the affected source is operating at the highest load or capacity level reasonably expected to occur. The maximum six-minute average opacity exhibited during the test period shall be used to determine whether the affected source is in compliance with the standard. The duration of the Method 9 performance test shall be 3-hours (30 6-minute averages), except that the duration of the of the Method 9 performance test may be reduced to 1-hour if (a) there are no individual readings greater than 10 percent opacity, and (b) there are no more than three readings of 10 percent for the first 1-hour period.
- (3) The owner or operator of an affected source subject to limitations on D/F emissions shall demonstrate initial compliance with the D/F emission limit by conducting a performance test using Method 23 of Appendix A CFR Part 60. The owner or operator of an in-line kiln/raw mill shall demonstrate initial compliance by conducting separate performance tests while the raw mill of the in-line kiln/raw mill is under normal operating conditions and while the raw mill of the in-line kiln/raw mill is not operating.
 - (i) Each performance test shall consist of three separate runs; each run shall be conducted under the conditions that exist when the affected source is operating at the highest load or capacity level reasonably expected to occur. The duration of each run shall be at least three hours and the sample volume for each run shall be at least 2.5 dscm (90 dscf). The concentration shall be determined for each run and the arithmetic average of the concentrations measured for the three runs shall be calculated and used to determine compliance.
 - (ii) The temperature at the inlet to the kiln/raw mill Particulate Matter Control Device (PMCD), and the temperature at the inlet to the alkali bypass PMCD must be continuously recorded during the period of the Method 23 test, and the temperature records must be included in the performance test report.
 - (iii) One-minute average temperatures must be calculated for each minute of each run of the test.
 - (iv) The run average temperature must be calculated for each run, and the average of the run average temperatures must be determined and included in the performance test report and will determine the applicable temperature limit in accordance with paragraph (b) of *Operating limits for kilns and in-line kiln/raw mills*.
- (c) Except as provided in paragraph (e) of this section, performance tests required under paragraph (b)(1) shall be repeated every five years, except that the initial performance test of opacity for the in-line kiln/raw mill and clinker cooler is not required.

- (d) Performance tests D/F required under paragraph (b)(3) of this section shall be repeated every 30 months.
- (e) The owner or operator is required to repeat the performance tests for in-line kiln/raw mills as specified in paragraphs (b)(1) and (b)(3) of this section within 90 days of initiating any significant change in the feed or fuel from that used in the previous performance test.
- (f) The table below provides a summary of the performance test requirements of this section.
40 CFR 63.1349

Summary of Performance Test Requirements

Affected source and pollutant	Performance test
New and existing kiln and in-line kiln/raw mill PM	EPA Method 5 ⁽¹⁾
New and existing kiln and in-line kiln/raw mill Opacity	COM
New and existing kiln and in-line kiln/raw mill D/F	EPA Method 23 ⁽²⁾
New and existing clinker cooler PM	EPA Method 5 ⁽¹⁾
New and existing clinker cooler Opacity	COM
New and existing raw and finish mill Opacity	EPA Method 9 ⁽¹⁾
New and existing raw material dryer and materials handling processes(raw material storage, clinker storage, finished product storage, conveyor transfer points, bagging, and bulk loading and unloading systems) Opacity	EPA Method 9 ⁽¹⁾

⁽¹⁾ Required initially and every five (5) years thereafter.

⁽²⁾ Required initially and every 30 months thereafter.

Monitoring requirements

- (a) The owner or operator of this facility shall prepare for each affected source subject to the provisions of this subpart, a written operations and maintenance plan. The plan shall be submitted to the Administrator for review and approval as part of the application for a part 70 permit and shall include the following information:
- (1) Procedures for proper operation and maintenance of the affected source and air pollution control devices in order to meet the emission limits and operating limits listed above under *Emission Standards and Operating Limits*;
 - (2) Corrective actions to be taken when required by paragraph (e) of this section;
 - (3) Procedures to be used during an inspection of the components of the combustion system of each kiln and each in-line kiln/raw mill located at the facility at least once per year; and
 - (4) Procedures to be used to periodically monitor affected sources subject to opacity standards under *Standards for new and reconstructed raw material dryers*, and

Standards for affected sources other than kiln; in-line kiln/raw mills; clinker coolers; new and reconstructed raw material dryers; and raw and finish mills. Such procedures must include the provisions of (a)(4)(i) through (a)(4)(iv) of this section.

- (i) The owner or operator must conduct a monthly 1-minute visible emissions test of each affected source in accordance with Method 22 of Appendix A of 40 CFR 60. The test must be conducted while the affected source is in operation.
 - (ii) If no visible emissions are observed in six consecutive monthly tests for any affected source, the owner or operator may decrease the frequency of testing from monthly to semi-annually for that affected source. If visible emissions are observed during any semi-annual test, the owner or operator must resume testing of that affected source on a monthly basis and maintain that schedule until no visible emissions are observed in six consecutive monthly tests.
 - (iii) If no visible emissions are observed during the semi-annual test for any affected source, the owner or operator may decrease the frequency of testing from semi-annually to annually for that affected source. If visible emissions are observed during any annual test, the owner or operator must resume testing of that affected source on a monthly basis and maintain that schedule until no visible emissions are observed in six consecutive monthly tests.
 - (iv) If visible emissions are observed during any Method 22 test, the owner or operator must conduct a 6-minute test of opacity in accordance with Method 9 of Appendix A of 40 CFR 60. The Method 9 test must begin within one hour of any observation of visible emissions.
 - (v) The requirement to conduct a Method 22 visible emissions monitoring under this subsection shall not apply to any totally enclosed conveying system transfer point regardless of the location of the transfer point. "Totally enclosed conveying system transfer point" shall mean a conveying system transfer point that is enclosed on all sides, top, and bottom. The enclosures for these transfer points shall be operated and maintained as total enclosures on a continuing basis in accordance with the facility operations and maintenance plan.
 - (vi) If any partially enclosed or unenclosed conveying system transfer point is located in a building, the owner or operator of the portland cement plant shall have the option to conduct a Method 22 visible emissions monitoring test according to the requirements of (i) to (iv), above, for each conveying system transfer point within the building or for the building itself, according to (vii) below.
 - (vii) If visible emissions from a building are monitored, the requirements of (i) through (iv) above apply to the monitoring of the building, and you must also do the following: Test visible emissions from each side, roof and vent of the building for at least one minute. The test must be conducted under normal operating conditions.
- (b) Failure to comply with any provision of the operations and maintenance plan developed in accordance with paragraph (a) of this section shall be a violation of the standard.
- (c) The owner or operator of the kiln or in-line kiln/raw mill shall monitor opacity where emissions are vented from these affected sources and the alkali bypass.
- (1) The owner or operator shall install, calibrate, and continuously operate a continuous opacity monitor (COM) to continuously monitor the opacity of the emissions discharged to the atmosphere. The COM shall be installed, maintained, calibrated, and operated as

- required by 40 CFR 63 Subpart A *General Provisions*, and according to Performance Specifications 1 (PS-1) of 40 CFR 60, Appendix B.
- (2) To remain in compliance, the opacity must be maintained such that the 6-minute average opacity for any-minute block period does not exceed 20 percent (reduced to 10 percent by Iowa DNR Construction Permit 78-A-579P). If the average opacity for any 6-minute block period exceeds 20 percent (reduced to 10 percent by Iowa DNR Construction Permit 78-A-579P), this shall constitute a violation of the standard.
- (d) The owner or operator of a clinker cooler shall monitor opacity at each point where emissions are vented from the clinker cooler in accordance with paragraphs (d)(1) and (d)(2) of this paragraph.
- (1) The owner or operator shall install, calibrate, and continuously operate a continuous opacity monitor (COM) to continuously monitor the opacity of the emissions discharged to the atmosphere. The COM shall be installed, maintained, calibrated, and operated as required by 40 CFR 63 Subpart A *General Provisions*, and according to Performance Specifications 1 (PS-1) of 40 CFR 60, Appendix B.
- (2) To remain in compliance, the opacity must be maintained such that the 6-minute average opacity for any-minute block period does not exceed 10 percent. If the average opacity for any 6-minute block period exceeds 10 percent, this shall constitute a violation of the standard.
- (e) The owner or operator of a raw mill or finish mill shall monitor opacity by conducting daily visual emissions observations of the mill sweep and separator PMCDs of these affected sources, in accordance with the procedures of Method 22 of 40 CFR 60, Appendix A . The Method 22 test shall be conducted while the affected source is operating at the highest load or capacity level reasonably expected to occur within the day. The duration of the Method 22 test shall be six minutes. If visible emissions are observed during the Method 22 visible emissions test, the owner or operator must:
- (1) Initiate, within one-hour, the corrective actions specified in the site specific operations and maintenance plan developed in accordance with paragraphs (a)(1) and (a)(2) of this section; and
- (2) Within 22 hours of the end of the Method 22 test in which visible emissions were observed, conduct a visual opacity test of each stack from which visible emissions were observed in accordance with Method 9 of 40 CFR 60, Appendix A. The duration of the Method 9 test shall be thirty minutes.
- (f) The owner or operator of an affected source subject to a limitation on D/F emissions shall monitor D/F emissions in accordance with paragraphs (f)(1) through (f)(6) of this section.
- (1) The owner or operator shall install, calibrate, maintain, and continuously operate a continuous monitor to record the temperature of the exhaust gases from the kiln, in-line kiln/raw mill and alkali bypass, if applicable, at the inlet to, or upstream of, the kiln, in-line kiln/raw mill and/or alkali bypass PM control devices.
- (i) The recorder response range must include zero and 1.5 times either of the average temperatures established according to the requirements in (b)(3)(iv) of *Performance testing requirements*.
- (ii) The reference method must be a National Institute of Standards and Technology calibrated reference thermocouple-potentiometer system or alternate reference,

subject to approval by the Administrator.

- (2) The owner or operator shall monitor and continuously record the temperature of the exhaust gases from the kiln, in-line kiln/raw mill and alkali bypass, if applicable, at the inlet to the kiln, in-line kiln/raw mill and/or alkali bypass PMCD.
 - (3) The three-hour rolling average temperature shall be calculated as the average of 180 successive one-minute average temperatures.
 - (4) Periods of time when one-minute averages are not available shall be ignored when calculating three-hour rolling averages. When one-minute averages become available, the first one-minute average is added to the previous 179 values to calculate the three-hour rolling average.
 - (5) When the operating status of the raw mill of the in-line kiln/raw mill is changed from off to on, or from on to off the calculation of the three-hour rolling average temperature must begin anew without considering previous readings.
 - (6) The calibration of all thermocouples and other temperature sensors shall be verified at least once every three months.
- (g) The owner or operator of any kiln or in-line kiln/raw mill subject to a D/F emission limit under this subpart shall conduct an inspection of the components of each kiln or in-line kiln/raw mill at least once per year.
- (h) The owner or operator of an affected source subject to a limitation on opacity under *Standards for new and reconstructed raw material dryers*, and *Standards for affected sources other than kiln, in-line kiln/raw mills; clinker coolers; new and reconstructed raw material dryers; and raw and finish mills* shall monitor opacity in accordance with the operation and maintenance plan developed in accordance with paragraph (a) of this section.
- (i) The owner or operator of an affected source subject to a particulate matter standard under *Standards for kilns and in-line kiln/raw mills* shall install, calibrate, maintain and operate a particulate matter continuous emission monitoring system (PM CEMS) to measure the particulate matter discharged to the atmosphere. The compliance deadline for installing the PM CEMS and all requirements relating to performance of the PM CEMS and implementation of the PM CEMS is deferred pending further rulemaking.
- (j) An owner or operator may submit an application to the Administrator for approval of alternate monitoring requirements to demonstrate compliance with the emission standards of this subpart, except for emission standards for THC, subject to the provisions of paragraphs (j)(1) to (j)(6) of this section.
- (1) The Administrator will not approve averaging periods other than those specified in this section, unless the owner or operator documents, using data or information, that the longer averaging period will ensure that emissions do not exceed levels achieved during the performance test over any increment of time equivalent to the time required to conduct three runs of the performance test.
 - (2) If the application to use an alternate monitoring requirement is approved, the owner or operator must continue to use the original monitoring requirement until approval is received to use another monitoring requirement.
 - (3) The owner or operator shall submit the application for approval of alternate monitoring requirements no later than the notification of performance test. The

application must contain the information specified in paragraphs (j)(3)(i) through (j)(3)(iii) of this section:

- (i) Data or information justifying the request, such as the technical or economic infeasibility, or the impracticality of using the required approach;
 - (ii) A description of the proposed alternative monitoring requirement, including the operating parameter to be monitored, the monitoring approach and technique, the averaging period for the limit, and how the limit is to be calculated; and
 - (iii) Data or information documenting that the alternative monitoring requirement would provide equivalent or better assurance of compliance with the relevant emission standard.
- (4) The Administrator will notify the owner or operator of the approval or denial of the application within 90 calendar days after receipt of the original request, or within 60 calendar days of the receipt of any supplementary information, whichever is later. The Administrator will not approve an alternative monitoring application unless it would provide equivalent or better assurance of compliance with the relevant emission standard. Before disapproving any alternate monitoring application, the Administrator will provide:
- (i) Notice of the information and findings upon which the intended disapproval is based; and
 - (ii) Notice of opportunity for the owner or operator to present additional supporting information before final action is taken on the application. This notice will specify how much additional time is allowed for the owner or operator to provide additional supporting information.
- (5) The owner or operator is responsible for submitting any supporting information in a timely manner to enable the Administrator to consider the application prior to the performance test. Neither submittal of an application, nor the Administrator's failure to prove or disprove the application relieves the owner or operator of the responsibility to comply with any provision of this subpart.
- (6) The Administrator may decide at any time, on a case-by-case basis that additional or alternative operating limits, or alternative approaches to establishing operating limits, are necessary to demonstrate compliance with the emission standards of this subpart.
- 40 CFR 63.1350*

Reporting, and Recordkeeping

Reporting requirements

- (a) The reporting provisions of subpart A of this part that apply and those that do not apply to owners or operators of affected sources subject to this subpart are listed in Table 1 of this subpart. If any State requires a report that contains all of the information required in a report that contains all of the information required in a report listed in this section, the owner or operator may send the Administrator a copy of the report sent to the State to satisfy the requirements of this section for that report.
- (b) The owner or operator of an affected source shall comply with the reporting requirements specified in Sec. 63.10 of the general provisions of this part 63, subpart A as follows:
 - (1) As required by Sec. 63.10(d)(2), the owner or operator shall report the results of performance tests as part of the notification of compliance status.

- (2) As required by Sec. 63.10(d)(3), the owner or operator of an affected source shall report the opacity results from tests required by Sec. 63.1349.
- (3) As required by Sec. 63.10(d)(4), the owner or operator of an affected source who is required to submit progress reports as a condition of receiving an extension of compliance under Sec. 63.6(i) shall submit such reports by the dates specified in the written extension of compliance.
- (4) As required by Sec. 63.10(d)(5), if actions taken by an owner or operator during a startup, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are consistent with the procedures specified in the source's startup, shutdown, and malfunction plan specified in Sec. 63.6(e)(3), the owner or operator shall state such information in a semiannual report. Reports shall only be required if a startup, shutdown, or malfunction occurred during the reporting period. The startup, shutdown, and malfunction report may be submitted simultaneously with the excess emissions and continuous monitoring system performance reports; and
- (5) Any time an action taken by an owner or operator during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) is not consistent with the procedures in the startup, shutdown, and malfunction plan, the owner or operator shall make an immediate report of the actions taken for that event within 2 working days, by telephone call or facsimile (FAX) transmission. The immediate report shall be followed by a letter, certified by the owner or operator or other responsible official, explaining the circumstances of the event, the reasons for not following the startup, shutdown, and malfunction plan, and whether any excess emissions and/or parameter monitoring exceedances are believed to have occurred.
- (6) As required by Sec. 63.10(e)(2), the owner or operator shall submit a written report of the results of the performance evaluation for the continuous monitoring system required by Sec. 63.8(e). The owner or operator shall submit the report simultaneously with the results of the performance test.
- (7) As required by Sec. 63.10(e)(2), the owner or operator of an affected source using a continuous opacity monitoring system to determine opacity compliance during any performance test required under Sec. 63.7 and described in Sec. 63.6(d)(6) shall report the results of the continuous opacity monitoring system performance evaluation conducted under Sec. 63.8(e).
- (8) As required by Sec. 63.10(e)(3), the owner or operator of an affected source equipped with a continuous emission monitor shall submit an excess emissions and continuous monitoring system performance report for any event when the continuous monitoring system data indicate the source is not in compliance with the applicable emission limitation or operating parameter limit.
- (9) The owner or operator shall submit a summary report semiannually which contains the information specified in Sec. 63.10(e)(3)(vi). In addition, the summary report shall include:
 - (i) All exceedences of maximum control device inlet gas temperature limits specified in Sec. 63.1344(a) and (b);
 - (ii) All failures to calibrate thermocouples and other temperature sensors as required under Sec. 63.1350(f)(7) of this subpart; and
 - (iii) All failures to maintain the activated carbon injection rate, and the activated carbon injection carrier gas flow rate or pressure

- drop, as applicable, as required under Sec. 63.1344(c).
- (iv) The results of any combustion system component inspections conducted within the reporting period as required under Sec. 63.1350(i).
 - (v) All failures to comply with any provision of the operation and maintenance plan developed in accordance with Sec. 63.1350(a).
- (10) If the total continuous monitoring system downtime for any CEM or any continuous monitoring system (CMS) for the reporting period is ten percent or greater of the total operating time for the reporting period, the owner or operator shall submit an excess emissions and continuous monitoring system performance report along with the summary report.
- 40 CFR 63.1354*

Recordkeeping requirements

- (a) The permittee shall maintain files of all information (including all reports and notifications) required by this section recorded in a form suitable and readily available for inspection and review as required by Sec. 63.10(b)(1). The files shall be retained for at least five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two years of data shall be retained on site. The remaining three years of data may be retained off site. The files may be maintained on microfilm, on a computer, on floppy disks, on magnetic tape, or on microfiche.
- (b) The owner or operator shall maintain records for each affected source as required by Sec. 63.10(b)(2) and (b)(3) of this part; and
 - (1) All documentation supporting initial notifications and notifications of compliance status under Sec. 63.9;
 - (2) All records of applicability determination, including supporting analyses; and
 - (3) If the owner or operator has been granted a waiver under Sec. 63.8(f)(6), any information demonstrating whether a source is meeting the requirements for a waiver of recordkeeping or reporting requirements.
- (c) In addition to the recordkeeping requirements in paragraph (b) of this section, the owner or operator of an affected source equipped with a continuous monitoring system shall maintain all records required by Sec. 63.10(c).

40 CFR 63.1355

Temporary, conditioned exemption from particulate matter and opacity standards

- (a) Subject to the limitations of paragraphs (b) through (f) of this section, an owner or operator conducting PM CEMS correlation tests (that is, correlation with manual stack methods) is exempt from:
 - (1) Any particulate matter and opacity standards of part 60 or part 63 of this chapter that are applicable to cement kilns and in-line kiln/raw mills.
 - (2) Any permit or other emissions or operating parameter or other limitation on workplace practices that are applicable to cement kilns and in-line kiln raw mills to ensure compliance with any particulate matter and opacity standards of this part or part 60 of this chapter.

- (b) The permittee must develop a PM CEMS correlation test plan. The plan must be submitted to the Administrator for approval at least 90 days before the correlation test is scheduled to be conducted.

The plan must include:

- (1) The number of test conditions and the number of runs for each test condition;
 - (2) The target particulate matter emission level for each test condition;
 - (3) How the operation of the affected source will be modified to attain the desired particulate matter emission rate; and
 - (4) The anticipated normal particulate matter emission level.
- (c) The Administrator will review and approve or disapprove the correlation test plan in accordance with Sec. 63.7(c)(3)(i) and (iii). If the Administrator fails to approve or disapprove the correlation test plan within the time period specified in Sec. 63.7(c)(3)(iii), the plan shall be considered approved, unless the Administrator has requested additional information.
- (d) The stack sampling team must be on-site and prepared to perform correlation testing no later than 24 hours after operations are modified to attain the desired particulate matter emissions concentrations, unless the correlation test plan documents that a longer period is appropriate.
- (e) The particulate matter and opacity standards and associated operating limits and conditions will not be waived for more than 96 hours, in the aggregate, for a correlation test, including all runs and conditions.
- (f) The owner or operator must return the affected source to operating conditions indicative of compliance with the applicable particulate matter and opacity standards as soon as possible after correlation testing is completed.

40 CFR 63.1357

Delegation of authority

- (a) In delegating implementation and enforcement authority to a State under subpart E of this part, the authorities contained in paragraph (b) of this section shall be retained by the Administrator and not transferred to a State.
- (b) Authority which will not be delegated to States:
 - (1) Approval of alternative non-opacity emission standards under Sec. 63.6(g).
 - (2) Approval of alternative opacity standards under Sec. 63.6(h)(9).
 - (3) Approval of major changes to test methods under Secs. 63.7(e)(2)(ii) and 63.7(f).
A major change to a test method is a modification to a federally enforceable test method that uses unproven technology or procedures or is an entirely new method (sometimes necessary when the required test method is unsuitable).
 - (4) Approval of major changes to monitoring under Sec. 63.8(f). A major change to monitoring is a modification to federally enforceable monitoring that uses unproven technology or procedures, is an entirely new method (sometimes necessary when the

- required monitoring is unsuitable), or is a change in the averaging period.
- (5) Waiver of recordkeeping under Sec. 63.10(f).
40 CFR 63.1358

Authority for Requirement: 40 CFR 63 Subpart LLL and Subpart A
567 IAC 23.1(4)"bl"

Appendix D: IDNR Air Quality Policy 3-b-08 (Opacity)

1998 NOV 13 4

IOWA DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

POLICY/PROCEDURE STATEMENT

TOPIC: <u>Opacity Limits</u>

Policy Procedure Number: 3-b-08

Replaces Number: None

Date:

Effective Date: November 12, 1998

Preparer: David Phelps

Reviewer:

Approval: **Bureau Chief:** Peter Hamlin

Date: 11/12/98

Division Administrator: Allan Stokes

Date: 11/12/98

Applicable Code of Iowa or Iowa Administrative Code Rule: 23.3(2)d

“No person shall allow, cause or permit the emission of visible air contaminants into the atmosphere from any equipment, internal combustion engine, premise fire, open fire or stack, equal to or in excess of 40 percent opacity or that level specified in a construction permit, except as provided below and in 567-Chapter 24.”

REASON OR BACKGROUND

The default opacity limit allowed by regulation is 40%. This limit was established with the original regulations in 1970. It is generally accepted that opacity greater than 40% was evidence of a mass emission standard exceedence. More recently, there have been requests from facilities for limits much lower than that allowed by the regulations, in some cases less than 0.01 gr/scf to which a 40% opacity limit does not correspond. Since opacity is used as an indicator of the particulate emission rate, listing an indicated potential problem opacity that is more in line with the mass emission rate is useful. In order to have the authority to set limits lower than 40%, subrule 23.3(2)d was changed. This change allows the department the ability to set opacity limits at a level that more closely corresponds to what would be observed by the source when operating in compliance with its mass emission rate.

Except in the case where a specific opacity limit is established by rule, it has been the general policy of the Department not to take action on opacity limits directly. Rather, if it is felt that a violation of the mass emission rate exists that is not attributable to some abnormal event, a stack test would be required to verify compliance. However, the Department reserves the right to use the results of formal opacity readings as evidence of an exceedence.

DETAILS

It shall be the policy of the Department to list the default opacity as a permit condition and in addition an indicator opacity may be listed.

For ease of proving continual compliance a source may request a 'no visible emissions' opacity limit which allows proof of compliance without having a certified opacity reading taken. In this case any visible emissions would be an exceedence.

The IDNR permit writer may list an opacity that will be a indicator of possible mass emission rate exceedence. If the permittee wishes, the recommended indicator opacity may be changed by demonstrating compliance with the mass emission rate during a stack test while emitting the new desired indicator opacity. If the tested mass emission rate is less than the permitted emission rate, then the desired indicator opacity may be set at a proportionally higher level than observed during the stack test.

If an opacity measurement, taken in accordance with an approved reference method for opacity, (generally USEPA Method 9 or 22) exceeds the indicator opacity then the facility will promptly investigate the source and make corrections. However, if after corrections are made the opacity continues to exceed the indicator opacity the Department may require additional proof to demonstrate compliance with the mass emissions limits.

Recommended indicator opacities shall be:

Grain Loading gr./scf	Recommended Indicator Opacity
<0.01 gr./scf	non specified in permit *
0.01 to 0.06 gr./scf	10% Opacity
0.061 to 0.08 gr./scf	20% Opacity
0.081 to 0.1 gr./scf	25% Opacity

* A line is added to the permit that states: "If visible emissions are observed other than start-up, shut-down, or malfunction, a stack test may be required to demonstrate compliance with the particulate standard."

If a source is a batch process the indicator opacity shall be based on the table above, but the opacity averaging period, for comparison to the indicator opacity, shall be the entire batch cycle. For purposes of comparison the indicator opacity readings shall be taken during the entire cycle and averaged.

Sources are also given the opportunity to set source specific limits to be coordinated with the initial compliance test. These may then be incorporated into the permit.

In all cases an exceedence of the indicator opacity will require the permittee to file an "indicator opacity exceedence report" to the IDNR regional office. The reporting requirements shall be:

Oral report of excess indicator opacity. An incident of excess indicator opacity (other than an incident of excess indicator opacity during a period of startup, shutdown, or cleaning) shall be reported to the appropriate regional office of the department within eight hours of, or at the start of the first working day following the onset of the of the incident. The reporting exemption for an incident of excess indicator opacity during startup and shutdown or cleaning does not relieve the owner or operator of a source with continuous monitoring equipment of the obligation of submitting reports required in subrule 25.1(6).

An oral report of excess indicator opacity is not required for a source with operational continuous monitoring equipment (as specified in subrule 25.1(1) if the incident of excess indicator opacity continues for less than 30 minutes and does not exceed the applicable visible emission standard by more than 10 percent opacity.

The oral report may be made in person or by telephone and shall include as a minimum the following:

- a) The identity of the equipment or source operation from which the excess indicator opacity originated and the associated stack or emission point.
- b) The estimated quantity of the excess indicator opacity.
- c) The time and expected duration of the excess indicator opacity.
- d) The cause of the excess indicator opacity.
- e) The steps being taken to remedy the excess indicator opacity.
- f) The steps being taken to limit the excess indicator opacity in the interim period.

Written report of excess indicator opacity. A written report of an incident of excess indicator opacity shall be submitted as a follow-up to all required oral reports to the department within seven (7) days of the onset of the upset condition, and shall include as a minimum the following:

- a) The identity of the equipment or source operation point from which the excess emission originate and the associated stack or emission point.
- b) The estimated quantity of the excess indicator opacity.
- c) The time and duration of the excess indicator opacity.
- d) The cause of the excess indicator opacity.
- e) The steps that were taken to remedy and to prevent the recurrence of the incident of excess indicator opacity.
- f) The steps that were taken to limit the excess indicator opacity.
- g) If the owner claims that the excess indicator opacity was due to malfunction, documentation to support this claim.

Exceptions to this policy:

- 1) In the case where a facility has an opacity limit established in an existing permit, no change will be made to that permit limit unless the permit is being modified for other purposes.
- 2) If the facility has a continuous opacity monitor, this policy shall not apply.
- 3) This policy shall not apply to opacity limits established in Prevention of Significant Deterioration (PSD) permits or permits that were established for maintenance plans for nonattainment areas.
- 4) This policy shall not apply where an opacity limit is established as an indication of hazardous air pollutants.

- 5) This policy shall not apply where an opacity limit is established by a rule, New Source Performance Standards (NSPS), National Emission Standards for Hazardous Air Pollutants (NESHAPS), etc.